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US EPA RECORDS CENTER REGION 5



472870



**PRELIMINARY ASSESSMENT/  
VISUAL SITE INSPECTION**

**GENERAL MOTORS CORPORATION -  
NORTHERN AMERICAN TRUCK PLATFORMS  
(FORMERLY GENERAL MOTORS CORPORATION -  
TRUCK AND BUS GROUP)  
DETROIT, MICHIGAN  
MID 076 380 583**

**FINAL REPORT**

**Prepared for**

**U.S. ENVIRONMENTAL PROTECTION AGENCY  
Office of Waste Programs Enforcement  
Washington, DC 20460**

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## CONTENTS

<u>Section</u>	<u>Page</u>
EXECUTIVE SUMMARY .....	ES-1
1.0 INTRODUCTION .....	1
2.0 FACILITY DESCRIPTION .....	4
2.1 FACILITY LOCATION .....	4
2.2 FACILITY OPERATIONS .....	4
2.3 WASTE GENERATION AND MANAGEMENT .....	6
2.4 HISTORY OF DOCUMENTED RELEASES .....	14
2.5 REGULATORY HISTORY .....	15
2.6 ENVIRONMENTAL SETTING .....	18
2.6.1 Climate .....	18
2.6.2 Flood Plain and Surface Water .....	18
2.6.3 Geology and Soils .....	19
2.6.4 Groundwater .....	19
2.7 RECEPTORS .....	20
3.0 SOLID WASTE MANAGEMENT UNITS .....	22
4.0 AREAS OF CONCERN .....	33
5.0 CONCLUSIONS AND RECOMMENDATIONS .....	34
REFERENCES .....	43

### Appendix

A	VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS
B	VISUAL SITE INSPECTION FIELD NOTES

## FIGURES

<u>Figure</u>		<u>Page</u>
1	FACILITY LOCATION .....	5
2	FACILITY LAYOUT .....	8

## TABLES

<u>Table</u>		<u>Page</u>
1	SOLID WASTE MANAGEMENT UNITS .....	7
2	SOLID WASTES .....	9
3	SWMU AND AOC SUMMARY .....	41

## EXECUTIVE SUMMARY

PRC Environmental Management, Inc. (PRC), performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the General Motors Corporation - Northern American Truck Platforms (GMC-NATP) facility in Detroit, Wayne County, Michigan. The facility was formerly General Motors Corporation - Truck and Bus Group (GMC-TBG). This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

In 1919, General Motors Corporation-Fisher Body (GMC-FB) purchased about 13 acres of undeveloped land, which is currently the GMC-NATP facility. GMC-FB manufactured preliminary patterns in the form of wood that were used in the manufacturing of steel dies. The steel dies were shipped off site and used in sheet metal stamping mills. In 1973, the GMC-FB facility changed its name to General Motors Corporation - Assembly Division (GMC-AD) and its operations to assembling truck chassis that required metal cleaning and painting. In 1974, GMC-AD changed its name to General Motors Corporation - Chevrolet Plant (GMC-CP) and facility operations remained the same. In 1984, GMC-CP changed its name to GMC-TBG and facility operations remained the same. In 1987, the facility discontinued its metal cleaning process and painting operations. In 1993, GMC-TBG changed its name to General Motors Corporation - North American Truck Platforms (GMC-NATP) and facility operations currently consist of the truck chassis assembly only.

Between 1919 and 1973, GMC-FB manufactured preliminary patterns in the form of wood that were used in the manufacturing of steel dies. The steel dies were shipped off site and used in sheet metal stamping mills. According to a facility representative, the GMC-FB facility may have generated nonhazardous sawdust, scrap metal, and used oil. Hazardous waste streams generated by the GMC-FB facility are unknown. In 1973, GMC-AD changed its operations to the assembly of truck chassis that required metal cleaning and painting. From 1973 until 1987, the metal cleaning process consisted of a phosphating line with three 100-gallon tanks for cleaning, phosphating, and rinsing the metal. The phosphating line generated a nonhazardous phosphating rinsewater and phosphating sludge. From 1973 until 1987, the facility's painting operations generated the following hazardous wastes: spent solvent consisting of a mixture of methylene chloride, toluene, and methanol (D001,

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RIN # 01281-99  
INITIALS MV

ES-1

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F001, F002, and F005), paint sludge (D008 and 003D), paint sludge liquid (D008 and 003D), spent methylene chloride (F001 and F002), spent toluene (F005), discarded methylene chloride (U080) discarded toluene (U220), and discarded methanol (U154). The waste code 003D is a Michigan Department of Natural Resources (MDNR) waste code for zinc. Nonhazardous waste streams included paint chips and paint wastewater. From 1973 until 1991, nonhazardous rinsewater and lime sludge were generated from the facility's boilers' blowdown. The facility currently generates spent diesel fuel (D001) from erroneous filling of the trucks fuel tanks. The facility is currently generating asbestos from the facility's abatement programs in the powerhouse. In 1993, the facility had a one-time generation of caustic wastewater from cleaning the concrete pad of the Former West Gondola Storage Pad (SWMU 2) and the Former Central Gondola Storage Pad (SWMU 3). At the time of the PA/VSI, the facility had not determined if the caustic wastewater contained hazardous constituents. Nonhazardous used oil is generated from maintenance of equipment when changing oil in various machinery.

The GMC-NATP facility currently employs about 500 people working one 8-hour shift, five days per week. The facility consists of one assembly building with three floors and three parking lots. The GMC-NATP facility access is controlled by 24-hour security guards, cameras, and an 8-foot chain-link fence with barbed wire.

GMC-CP submitted a Notification of Hazardous Waste Activity form to EPA on August 20, 1980. The notification stated that the facility was operating as a large-quantity generator of hazardous waste and as a treatment, storage, or disposal (TSD) facility. GMC-CP submitted a RCRA Part A permit application on November 18, 1980. The RCRA Part A permit application specified the following estimated annual generation rates and process codes: 15,600 pounds of container storage (S01) for F017 waste code and 200 pounds of container storage (S01) and tank treatment (T01) for F007, F008, and F009 waste codes. The permit also specified a container storage (S01) capacity of 12,000 gallons and a tank treatment (T01) capacity of 20 gallons per day. The container storage (S01) refers to the Former East Container Storage Area (CSA) (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). According to a facility representative, the facility never treated hazardous wastes in tanks; therefore, the process code for tank treatment (T01) was apparently a protective filing.

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ES-2

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In October 1982, GMC-CP requested the withdrawal of its Part A permit application because F007, F008, and F009 waste codes were changed to include only waste containing cyanide, which the facility never generated. Also, paint sludges (F017) were delisted on January 16, 1981. In March 1983, EPA informed GMC-CP that it was not required to have a Part A permit application and that it qualified as a small-quantity generator of hazardous waste only. In April 1984, GMC-TBG requested the renewal of its Part A permit application because changes in the facility's processes no longer allowed the facility to meet the criteria of a small-quantity generator of hazardous waste only.

In April 1986, GMC-TBG again requested the withdrawal of its Part A permit application because of changes in the facility's processes and waste minimization practices. In May 1986, GMC-TBG submitted a revised Notification of Hazardous Waste Activity form to EPA. The notification stated that the facility was operating as a generator of hazardous waste only. In June 1986, EPA informed GMC-TBG that according to EPA files, the facility had stored hazardous waste for greater than 90 days, and therefore, the facility was considered a TSD facility.

In 1986, MDNR requested the submittal of a closure plan for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). The facility submitted a closure plan for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). In December 1986, MDNR requested additional information regarding the closure of the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). In December 1987, GMC-TBG submitted a revised closure plan to MDNR.

After a 30-day public comment period, MDNR received no comments on the revised closure plan. Therefore, in January 1988, MDNR approved the revised closure plan on the condition that GMC-TBG would conduct additional soil sampling if necessary after the removal of soil. However, during closure activities, the removal of soil was not required because analytical results of the soil samples from the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) did not contain hazardous constituents above background levels for soil. Therefore, additional soil sampling also was not conducted. Between July 1988 and October 1988, GMC-TBG completed closure activities according to the revised closure

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ES-3

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plan. In October 1988, GMC-TBG submitted to MDNR the closure certification for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) and in June 1989, submitted additional information regarding the closure to MDNR. In August 1989, MDNR approved the closure certification of the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3).

The PA/VSI identified the following 12 SWMUs and 1 AOC at the facility:

#### Solid Waste Management Units

1. Former East CSA
2. Former West Gondola Storage Pad
3. Former Central Gondola Storage Pad
4. Former Spent Solvent Satellite Accumulation Areas (SAA)
5. Former Container Accumulation Area (CAA)
6. Trash Compactor
7. Lime Wastewater Holding Tank
8. Current CSA
9. Asbestos CSA
10. Nonhazardous CSA
11. Used Oil Accumulation Areas
12. 800-Gallon Used Oil Aboveground Storage Tank (AST)

#### Areas of Concern

1. Product Diesel Fuel ASTs

SWMUs 7 and 12 pose a low to moderate potential for release to on-site soils because SWMU 7 is about 20 years old, constructed of a unknown material, and the water may contain hazardous constituents and SWMU 12 is not covered and is not properly managed because of the puddles of used oil surrounding the unit. SWMUs 7 and 12 pose a low potential for release to groundwater, surface water, and air.

AOC 1 poses a moderate potential for release to groundwater and on-site soils because one AST appears to have leaked a hazardous product material and the vegetation surrounding the ASTs appears to be stressed. AOC 1 poses a low potential for release to surface water and air.

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SWMUs 1, 2, and 3 pose a low potential for release to all environmental media because the units are inactive, were RCRA closed, and no documented releases have occurred.

SWMUs 4 and 5 pose a low potential for release to all environmental media because the units are inactive, were located on a concrete floor, and no documented releases have occurred.

SWMUs 6, 8, 9, 10, and 11 pose a low potential for release to all environmental media because the units have release controls, no documented releases have occurred, and they appear to be properly managed.

Sensitive environments are not located on site. No sensitive environments lie within 2 miles of the facility. The nearest surface water body, the Detroit River, is located 3.5 miles south of the facility and supplies municipal water to Detroit. The nearest residence is located within 0.5 mile southeast of the facility. The facility does not have an National Pollutant Discharge Elimination System (NPDES) permit to discharge to surface water. Storm water runoff from the facility collects on the paved areas around the facility and flows into storm water drains. Storm water drains to the city sewer system and is processed in Detroit's publicly owned treatment works (POTW) before being discharged to the Detroit River. Groundwater is not used as a private water supply. No drinking water wells and industrial wells are located within 3 miles of the facility. The facility has no on-site industrial water wells.

PRC recommends the facility identify the source of the milky white sheen, seal the underground pipes, and properly dispose of the contents in the Lime Wastewater Holding Tank (SWMU 7). Also, the facility should cover the 800-Gallon Used Oil AST (SWMU 12) and practice better waste management techniques. PRC recommends that the facility conduct soil sampling for organic constituents and total petroleum hydrocarbons (TPH) at the Product Diesel Fuel ASTs (AOC 1) to determine if releases have occurred.

PRC recommends no further action for the following SWMUs: the Former East CSA (SWMU 1), Former West Gondola Storage Pad (SWMU 2), Former Central Gondola Storage Pad (SWMU 3), Former Spent Solvent SAAs (SWMU 4), Former CAA (SWMU 5), Trash Compactor (SWMU 6),

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Current CSA (SWMU 8), Asbestos CSA (SWMU 9), Nonhazardous CSA (SWMU 10), and Used Oil Accumulation Areas (SWMU 11).

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## **1.0 INTRODUCTION**

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has usually exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading or unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release of hazardous waste or constituents to the environment has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where a strong possibility exists that such a release might occur in the future.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility
- Obtain information on the operational history of the facility
- Obtain information on releases from any units at the facility
- Identify data gaps and other informational needs to be filled during the VSI

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA
- Identify releases not discovered during the PA
- Provide a specific description of the environmental setting
- Provide information on release pathways and the potential for releases to each medium
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases

The VSI includes interviewing appropriate facility staff; inspecting the entire facility to identify all SWMUs and AOCs; photographing all visible SWMUs; identifying evidence of releases; making a preliminary selection of potential sampling parameters and locations, if needed; and obtaining additional information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the General Motors Corporation - Northern American Truck Platforms (GMC-NATP), facility formerly General Motors Corporation - Truck and

Bus Group (GMC-TBG), (EPA Identification No. MID 076 380 583) in Detroit, Wayne County, Michigan. The PA was completed on May 13, 1993. PRC gathered and reviewed information from the Michigan Department of Natural Resources (MDNR) and from EPA Region 5 RCRA files. Additional sources of information were obtained from the Federal Emergency Management Agency (FEMA), the National Oceanic and Atmospheric Administration (NOAA), the U.S. Department of Commerce (DOC), the U.S. Department of Agriculture (USDA), the U.S. Geological Survey (USGS), and the U.S. Department of Interior (DOI). The VSI was conducted on June 3, 1993. It included interviews with facility representatives and a walk-through inspection of the facility. PRC identified 12 SWMUs and 1 AOC at the facility.

The VSI is summarized and 15 of the 19 inspection photographs taken are included in Appendix A. The photographs have been renumbered; thus, their numbers differ from the photograph numbers in the VSI field notes, which are included in Appendix B.

## **2.0 FACILITY DESCRIPTION**

This section describes the facility's location; past and present operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors.

### **2.1 FACILITY LOCATION**

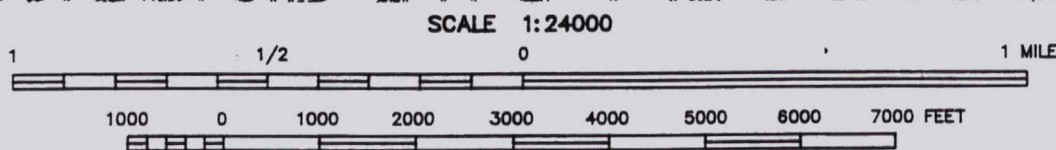
The GMC-NATP facility is located at 601 Piquette Road in Detroit, Wayne County, Michigan. Figure 1 shows the location of the facility in relation to the surrounding topographic features (latitude 42°22'09" N and longitude 83°03'53" W). The facility occupies 13 acres in an industrial area.

The facility is bordered on the north by Grand Trunk Railway, on the west by a retail meat market, on the south by Cameo Paint Company and an abandoned building, and on the east by Interstate I-75 and Commercial Carrier, Inc.

### **2.2 FACILITY OPERATIONS**

In 1919, General Motors Corporation-Fisher Body (GMC-FB) purchased about 13 acres of undeveloped land, which is currently the GMC-NATP facility. GMC-FB manufactured preliminary patterns in the form of wood that were used in the manufacturing of steel dies. The steel dies were shipped off site and used in sheet metal stamping mills. In 1973, the GMC-FB facility changed its name to General Motors Corporation - Assembly Division (GMC-AD). Operations changed to truck chassis assembly that required metal cleaning and painting. In 1974, GMC-AD changed its name to General Motors Corporation - Chevrolet Plant (GMC-CP) and facility operations remained the same. In 1984, GMC-CP changed its name to GMC-TBG and facility operations remained the same. In 1987, the facility discontinued its metal cleaning process and painting operations. In 1993, GMC-TBG changed its name to GMC-NATP and current facility operations consist of the truck chassis assembly only.





SCALE: 1" = 2,000'



GMC-NORTHERN AMERICAN TRUCK PLATFORMS  
DETROIT, MICHIGAN

**FIGURE 1**  
**FACILITY LOCATION**

**PRC** ENVIRONMENTAL MANAGEMENT, INC.

SOURCE: MODIFIED FROM USGS, HIGHLAND PARK AND  
DETROIT, MICHIGAN QUADRANGLES, 1983, 1980

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The facility currently manages waste at a Trash Compactor (SWMU 6), a Lime Wastewater Holding Tank (SWMU 7), a less than 90-day Current Container Storage Area (CSA) (SWMU 8), an Asbestos CSA (SWMU 9), a Nonhazardous CSA (SWMU 10), the Used Oil Accumulation Areas (SWMU 11), and an 800-Gallon Used Oil Aboveground Storage Tank (AST) (SWMU 12). The facility formerly had a Former East CSA (SWMU 1), a Former West Gondola Storage Pad (SWMU 2), a Former Central Gondola Storage Pad (SWMU 3), the Former Spent Solvent Satellite Accumulation Areas (SAA) (SWMU 4), and a Former Container Accumulation Area (CAA) (SWMU 5).

The GMC-NATP facility currently employs about 500 people working one 8-hour shift, five days per week. The facility consists of one assembly building with three floors and three parking lots. The GMC-NATP facility access is controlled by security guards 24-hour per day, cameras, and an 8-foot chain-link fence with barbed wire.

Solid wastes generated from facility operations and the SWMUs where they are managed are discussed in detail in Section 2.3.

## **2.3 WASTE GENERATION AND MANAGEMENT**

This section describes waste generation and management at the GMC-NATP facility. The facility's SWMUs are identified in Table 1. The facility layout, including SWMUs and AOCs, is shown in Figure 2. The facility's waste streams are summarized in Table 2.

Between 1919 and 1973, GMC-FB manufactured tool and pattern dies for stamping mills. According to a facility representative, the GMC-FB facility may have generated nonhazardous sawdust, scrap metal, and used oil. The quantities generated and disposition of these nonhazardous wastes are unknown. It is also unknown where these nonhazardous wastes were managed. Hazardous waste streams generated by the GMC-FB facility are unknown.

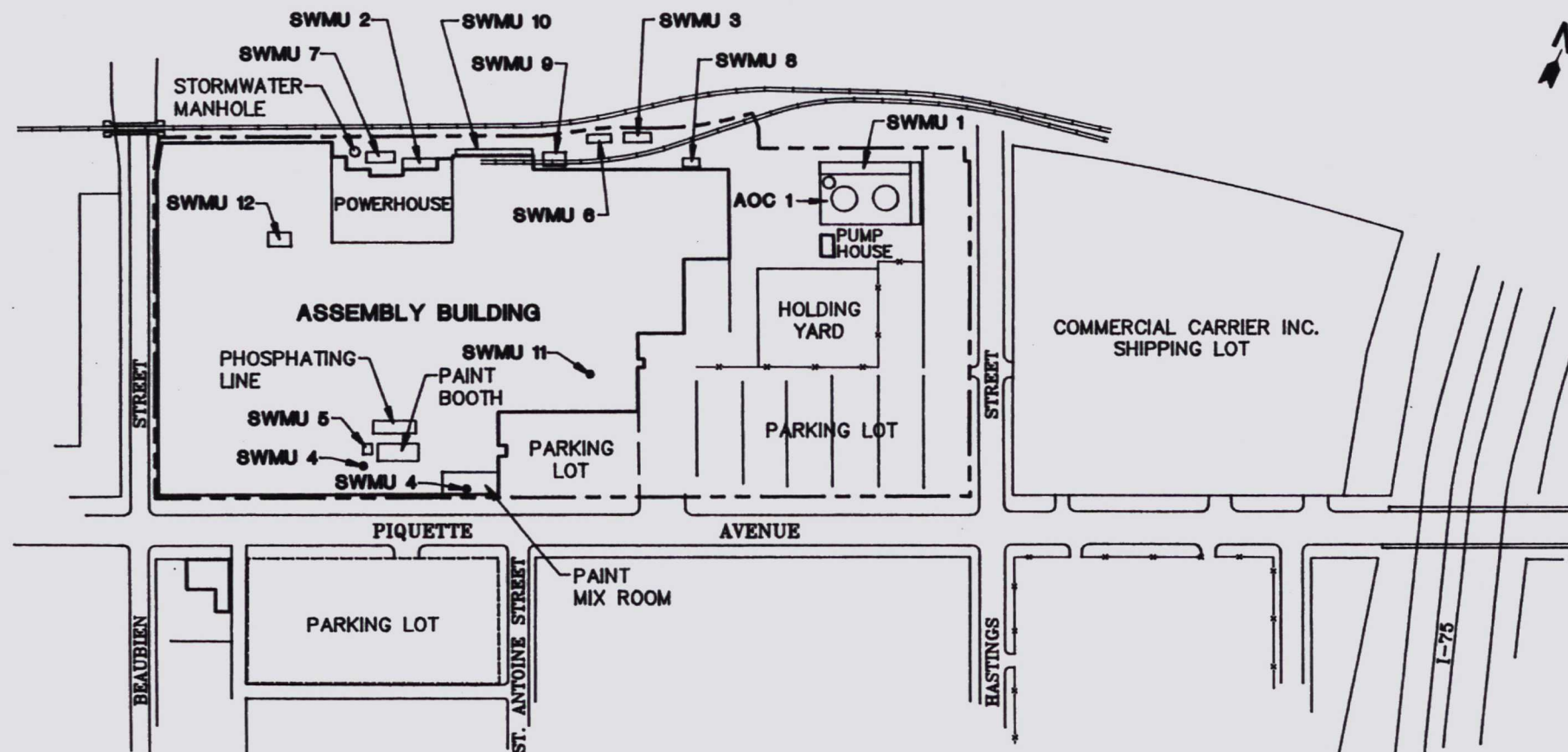
In 1973, GMC-AD operations included truck chassis assembly that required metal cleaning and painting. From 1973 until 1987, the metal cleaning process consisted of a phosphating line with three

**TABLE 1**  
**SOLID WASTE MANAGEMENT UNITS**

<u>SWMU Number</u>	<u>SWMU Name</u>	<u>RCRA Hazardous Waste Management Unit<sup>a</sup></u>	<u>Status</u>
1	Former East CSA	Yes	Inactive; RCRA closed in August 1989
2	Former West Gondola Storage Pad	Yes	Inactive; RCRA closed in August 1989
3	Former Central Gondola Storage Pad	Yes	Inactive; RCRA closed in August 1989
4	Former Spent Solvent SAAs	No	Inactive
5	Former CAA	No	Inactive
6	Trash Compactor	No	Active; storage of nonhazardous waste
7	Lime Wastewater Holding Tank	No	Active; storage of nonhazardous waste
8	Current CSA	No	Active; less than 90-day storage of hazardous waste
9	Asbestos CSA	No	Active; storage of nonhazardous waste
10	Nonhazardous CSA	No	Active; storage of nonhazardous waste
11	Used Oil Accumulation Areas	No	Active; accumulation of nonhazardous waste
12	800-Gallon Used Oil AST	No	Active; storage of nonhazardous waste

Note:

<sup>a</sup> A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

**SOLID WASTE MANAGEMENT UNITS**

- SWMU 1 FORMER EAST CSA
- SWMU 2 FORMER WEST GONDOLA STORAGE PAD
- SWMU 3 FORMER CENTRAL GONDOLA STORAGE PAD
- SWMU 4 FORMER SPENT SOLVENT SAAs
- SWMU 5 FORMER CAA
- SWMU 6 TRASH COMPACTOR
- SWMU 7 LIME WASTEWATER HOLDING TANK
- SWMU 8 CURRENT CSA
- SWMU 9 ASBESTOS CSA
- SWMU 10 NONHAZARDOUS CSA
- SWMU 11 USED OIL ACCUMULATION AREAS
- SWMU 12 800-GALLON USED OIL AST

**AREA OF CONCERN**

- AOC 1 PRODUCT DIESEL FUEL ASTs

**LEGEND**

- CSA CONTAINER STORAGE AREA
- SAA SATELLITE ACCUMULATION AREA
- CAA CONTAINER ACCUMULATION AREA
- AST ABOVEGROUND STORAGE TANK

GMC-NORTHERN AMERICAN TRUCK PLATFORMS  
DETROIT, MICHIGAN

**FIGURE 2****FACILITY LAYOUT**



**TABLE 2**  
**SOLID WASTES**

<u>Waste/EPA Waste Code<sup>a</sup></u>	<u>Source</u>	<u>Solid Waste Management Unit<sup>b, c</sup></u>
Sawdust/NA	Manufacture of tool and pattern dies	Unknown
Scrap metal/NA	Manufacture of tool and pattern dies	Unknown
Used oil/NA	Manufacture of tool and pattern dies	Unknown
Phosphating rinsewater/NA	Phosphating line	None
Phosphating sludge/NA	Phosphating line	SWMUs 1 and 8
Spent solvent/D001, F001, F002, and F005	Painting operations	SWMUs 1 and 4
Paint sludge/D008 and 003D <sup>d</sup>	Painting operations	SWMUs 2, 3, and 5
Paint sludge liquid/D008 and 003D <sup>d</sup>	Painting operations	SWMU 1
Spent methylene chloride/F001 and F002	Painting operations	SWMU 1
Spent toluene/F005	Painting operations and cleaning truck chassis lines	SWMUs 1 and 8
Discarded methylene chloride/U080	Painting operations	SWMU 1
Discarded toluene/U220	Painting operations	SWMU 1
Discarded methanol/U154	Painting operations	SWMU 1
Paint chips/NA	Painting operations	SWMU 6
Paint wastewater/NA	Painting operations	None
Spent diesel fuel/D001	Excess product material from filling truck's gasoline tank	SWMUs 1 and 8

**TABLE 2 (Continued)  
SOLID WASTES**

<u>Waste/EPA Waste Code<sup>a</sup></u>	<u>Source</u>	<u>Solid Waste Management Unit<sup>b, c</sup></u>
Lime wastewater/NA	Blowdown from boilers	SWMU 7
Lime sludge/NA	Blowdown from boilers	SWMU 7
Asbestos <sup>e</sup> /NA	Powerhouse	SWMU 9
Caustic wastewater/ND <sup>f</sup>	Cleaning concrete pad	SWMU 10
Used oil/NA	Maintenance of equipment	SWMUs 11 and 12

**Notes:**

- <sup>a</sup> Not applicable (NA) designates nonhazardous waste.
- <sup>b</sup> "None" indicates that the waste stream is not managed on site.
- <sup>c</sup> "Unknown" indicates that the waste was generated at the facility but that the SWMU that managed the waste cannot be determined.
- <sup>d</sup> "003D" is the MDNR waste code for zinc.
- <sup>e</sup> Waste is regulated under the Toxic Substances Control Act.
- <sup>f</sup> Not determined.



100-gallon tanks for cleaning, phosphating, and rinsing the metal. The phosphating line generated a nonhazardous phosphating rinsewater and phosphating sludge. From 1973 until 1987, the phosphating rinsewater was discharged directly from the phosphating line to Detroit's publicly owned treatment works (POTW). Until 1985, the phosphating sludge was stored in 55-gallon steel drums for greater than 90 days in the Former East CSA (SWMU 1). From 1985 until 1987, the phosphating sludge was stored for less than 90 days in the Current CSA (SWMU 8). The quantities generated and disposition of these nonhazardous wastes are unknown. According to a facility representative, no current employees at the facility have knowledge of this former process.

From 1973 until 1987, the facility's painting operations generated the following hazardous wastes: spent solvent (D001, F001, F002, and F005), paint sludge (D008 and 003D), paint sludge liquid (D008 and 003D), spent methylene chloride (F001 and F002), spent toluene (F005) discarded toluene (U220), discarded methylene chloride (U080), and discarded methanol (U154). From 1973 until present, the facility also generates spent toluene (F005) from cleaning the truck chassis line. Nonhazardous waste streams included paint chips and paint wastewater.

From 1973 until 1987, solvent consisting of either methylene chloride, toluene, or methanol was used in the cleaning of paint lines and paint equipment. Spent solvent consisting of a mixture of methylene chloride, toluene, and methanol (D001, F001, F002, and F005) was accumulated in a 55-gallon steel drum at the Former Spent Solvent SAAs (SWMU 4). When the drum was full, it was moved to the Former East CSA (SWMU 1) for greater than 90-day storage. GMC-TBG generated about 1,500 gallons of this waste annually. The spent solvent was transported off site to Petro-Chem, Inc. (Petro-Chem), in Detroit, Michigan, for fuel blending.

From 1973 until 1985, the facility used paints containing lead (D008) and zinc (003D) in its painting operations. The waste code 003D is a MDNR waste code for zinc. From 1985 until 1987, the facility discontinued using paints with lead and zinc. The GMC-TBG facility generated paint sludge (D008 and 003D) and paint sludge liquid (D008 and 003D) from the spray paint booth's water curtain. GMC-TBG skimmed paint sludge from a 2800-gallon process tank and transferred it to a 1-cubic yard Former CAA (SWMU 5) located near the paint booth. When the Former CAA was full, the paint sludge was transferred to a 20-cubic-yard roll-off container. From 1973 until 1984, the paint sludge was stored for greater than 90 days in a 20-cubic-yard roll-off container in the Former

West Gondola Storage Pad (SWMU 2). From 1984 until 1987, the paint sludge was stored for greater than 90 days in a 20-cubic-yard roll-off container in the Former Central Gondola Storage Pad (SWMU 3).

From 1973 until 1987, the paint sludge liquid was placed in a 55-gallon steel drum from the 2800-gallon holding tank and moved immediately to the Former East CSA (SWMU 1) for greater than 90-day storage.

From 1973 until 1980, the quantities generated and disposition of paint sludge and paint sludge liquid are unknown. From 1980 until 1985, the facility annually generated about 101,500 pounds of paint sludge and 2,900 gallons of paint sludge liquid and these wastes were transported off-site to Michigan Disposal in Belleville, Michigan, for disposal. From 1985 until 1987, the facility discontinued using paints with lead and zinc; therefore, these wastes were considered nonhazardous wastes. From 1985 until 1987, the quantities generated were the same as the 1980 to 1985 annual rates; however, the disposition of these wastes is unknown.

Paints used in the painting operations contained methylene chloride, toluene, and methanol. Spent methylene chloride (F001 and F002) and spent toluene (F005) were generated from cleaning the paint lines. Spent methylene chloride and spent toluene were placed in 55-gallon steel drums and were immediately moved to the Former East CSA (SWMU 1) for greater than 90-day storage. According to a facility representative, these hazardous wastes were generated in volumes of about 55 gallons at a time. From 1973 until 1980, the quantities generated and disposition of these wastes are unknown. From 1980 until 1987, the facility generated about 2,800 gallons of spent methylene chloride. The facility currently generates about 1,375 gallons of spent toluene from cleaning the truck chassis line. Spent toluene is currently stored for less than 90 days in the Current CSA (SWMU 8). Spent methylene chloride was transported off site to Michigan Disposal, in Belleville, Michigan, for disposal. Spent toluene is transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

Discarded methylene chloride (U080), discarded toluene (U220), and discarded methanol (U154) were generated because of excess product not used in the facility's painting operations. These wastes were stored in 55-gallon steel drums for greater than 90 days in the Former East CSA (SWMU 1). From 1980 until 1987, these wastes were generated periodically. The facility generated about 1,500 gallons



of discarded methylene chloride, 715 gallons of discarded toluene, and 55 gallons of discarded methanol, annually. These wastes were transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

From 1973 until 1987, nonhazardous paint chips were generated periodically as excess paint dried after painting operations. Paint chips were collected from the paint booth and immediately transferred to the Trash Compactor (SWMU 6). The quantities generated and disposition of this waste are unknown.

From 1973 until 1987, nonhazardous paint wastewater was generated from the facility's painting operations. The painting operations consisted of an overspray water curtain with a 2800-gallon process tank. When the paint wastewater became spent, it was periodically discharged to Detroit's POTW from the 2800-gallon process tank. According to a facility representative, the paint wastewater was analyzed for hazardous constituents prior to being discharged to Detroit's POTW; however, PRC found no documentation of this during federal, state, and local file reviews. The facility also had no documentation of the analytical results of this waste. The quantity of this waste generated is unknown.

The facility uses diesel fuel or unleaded gasoline as fuel for the truck chassis. Spent diesel fuel (D001) is generated when an employee fills a truck's fuel tank with the incorrect type of fuel. The spent diesel fuel is pumped into a 55-gallon steel drum. From 1973 until 1987, the 55-gallon steel drum was immediately moved to the Former East CSA (SWMU 1). The 55-gallon steel drums are currently stored in the less than 90-day Current CSA (SWMU 8). The facility generates about 500 gallons of this waste annually. The waste is transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

From 1973 until 1991, nonhazardous lime wastewater and lime sludge were generated from blowdown of the facility's boilers. According to a facility representative, in 1991, the facility discontinued using the boilers that are located in the facility's powerhouse. The lime wastewater and lime sludge were held in the underground Lime Wastewater Holding Tank (SWMU 7). The nonhazardous lime wastewater was discharged to the stormwater and sanitary sewer system. The nonhazardous lime sludge was removed periodically and sent off site to a pug mill in Detroit,

Michigan, for dewatering and recovery of lime. During the VSI, PRC noted a milky white sheen on the water in the storm water manhole near the Lime Wastewater Holding Tank (SWMU 7). Two of the three lids for the Lime Wastewater Holding Tank were removed and water in the tank had the same milky white sheen. Facility representatives did not know the size of the Lime Wastewater Holding Tank (SWMU 7); however, the holding tank is about 20 years old.

Asbestos abatement activities are currently being conducted at the facility. Asbestos is regulated under the Toxic Substances Control Act and is not considered a hazardous waste under RCRA regulations. Asbestos is removed from the powerhouse and is stored in a 20-cubic-yard roll-off box at the Asbestos CSA (SWMU 9). The asbestos is transported off site to U.S. Pollution Control Industries in East Chicago, Indiana, for disposal.

In 1993, the facility had a one-time generation of caustic wastewater from cleaning the concrete pad of the Former West Gondola Storage Pad (SWMU 2) and the Former Central Gondola Storage Pad (SWMU 3). At the time of the PA/VSI, the caustic wastewater was stored in 15 55-gallon steel drums in the Nonhazardous CSA (SWMU 10). According to a facility representative, the caustic wastewater is being analyzed to determine if it contains hazardous constituents. Disposition of this waste is contingent upon analytical results.

Nonhazardous used oil is generated from maintenance of equipment when changing oil in various machinery. The used oil is accumulated in 55-gallon steel drums at the Used Oil Accumulation Areas (SWMU 11) located throughout the facility. When a drum is full, it is transferred to the 800-Gallon Used Oil AST (SWMU 12). The facility generates about 96,000 gallons of this waste annually. This waste is transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

## **2.4 HISTORY OF DOCUMENTED RELEASES**

This section discusses the history of documented releases to groundwater, surface water, air, and on-site soils at the facility. The facility has had two releases to surface water and two releases to air.

In December 1983, a heat exchanger on one of the product ASTs that contained fuel oil developed a leak. The heat exchanger is steam operated and the condensate return line drains to the Detroit city



sewer system. GMC-TBG released about 50 gallons of fuel oil to the Detroit city sewer system. The Detroit city sewer system empties into the Detroit River after being processed in Detroit's POTW. GMC-TBG notified MDNR, U.S. Coast Guard, and City of Detroit's POTW. The heat exchanger was immediately shut down and was repaired. It appears that no further action was required (MDNR 1983).

In April 1986, relief valves on the unleaded gasoline USTs were not properly opened, causing an overflow of gasoline from the vent pipe. The overflow of unleaded gasoline released about 250 gallons of unleaded gasoline to the Detroit city sewer system. The unleaded gasoline pumping system was immediately shut down. GMC-NATP contacted MDNR, City of Detroit's POTW, and the National Response Center. It appears that no further action was required (MDNR 1986a).

In 1991, GMC-TBG received two violation notices from the Wayne County Department of Health - Air Pollution Control Division for the malfunctioning of the powerhouse's burner and opacity meter. The violation notices were sent to the facility for exceeding its air permit limits for burning fuel oil. The malfunctions were corrected and it appears no further action was required (GMC-TBG 1991).

## **2.5 REGULATORY HISTORY**

GMC-CP submitted a Notification of Hazardous Waste Activity form to EPA on August 20, 1980 (GMC-CP 1980a). The notification stated that the facility was operating as a large-quantity generator of hazardous waste and as a treatment, storage, or disposal (TSD) facility. GMC-CP submitted a RCRA Part A permit application on November 18, 1980 (GMC-CP 1980b).

The RCRA Part A permit application specified the following estimated annual generation rates and process codes: 15,600 pounds of container storage (S01) for F017 waste code and 200 pounds of container storage (S01) and tank treatment (T01) for F007, F008, and F009 waste codes. The permit also specified a container storage (S01) capacity of 12,000 gallons and a tank treatment (T01) capacity of 20 gallons per day. The container storage (S01) refers to the Former East CSA (SWMU 1), Former West Gondola Storage Pad (SWMU 2), and Former Central Gondola Storage Pad (SWMU 3). According to a facility representative, the facility never treated hazardous wastes in tanks; therefore, the process code for tank treatment (T01) was apparently a protective filing.



In October 1982, GMC-CP requested the withdrawal of its Part A permit application because F007, F008, and F009 waste codes were changed to include only waste containing cyanide which the facility never generated. Also, paint sludges (F017) were delisted on January 16, 1981 (GMC-CP 1982). In March 1983, EPA informed GMC-CP that it was not required to have a Part A permit application and that it qualified as a small-quantity generator of hazardous waste only (EPA 1983). In April 1984, GMC-TBG requested the renewal of its Part A permit application because of changes in the facility's processes no longer allowed the facility to meet the criteria of a small-quantity generator of hazardous waste only (GMC-TBG 1984).

In April 1986, GMC-TBG again requested the withdrawal of its Part A permit application because of changes in its processes and waste minimization practices within the facility (GMC-TBG 1986a). In May 1986, GMC-TBG submitted a revised Notification of Hazardous Waste Activity form to EPA. The notification stated the facility was operating as a generator of hazardous waste only (GMC-TBG 1986b). In June 1986, EPA informed GMC-TBG that according to its file, the facility had stored hazardous waste for greater than 90 days, and therefore, the facility was considered a TSD facility (EPA 1986).

In 1986, MDNR requested the submittal of a closure plan for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). The facility submitted a closure plan for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). In December 1986, MDNR requested additional information regarding the closure of the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) (MDNR 1986b). In February 1987, GMC-TBG submitted a revised closure plan and additional information regarding the closure of the Former East CSA, the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) (GMC-TBG 1987a). In December 1987, GMC-TBG submitted a revised closure plan to MDNR (GMC-TBG 1987b).

After a 30-day public comment period, MDNR received no comments on the revised closure plan. Therefore, in January 1988, MDNR approved the revised closure plan on the condition that

GMC-TBG conduct additional soil sampling if necessary after the removal of soil (MDNR 1988). However, during closure activities, the removal of soil was not required because analytical results of the soil samples from the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) did not contain hazardous constituents above background levels for soil. Therefore, additional soil sampling was not conducted. Between July 1988 and October 1988, GMC-TBG completed closure activities according to the revised closure plan. In October 1988, GMC-TBG submitted to MDNR the closure certification for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3). In June 1989, the facility submitted additional information regarding the closure to MDNR. In July 1989, MDNR informed GMC-TBG that the closure certification was inadequate and that GMC-TBG needed to submit additional information to MDNR (MDNR 1989a). In July 1989, GMC-TBG submitted the additional information and in August 1989, MDNR approved the closure certification for the Former East CSA (SWMU 1), the Former West Gondola Storage Pad (SWMU 2), and the Former Central Gondola Storage Pad (SWMU 3) (MDNR 1989b).

The facility is required to have operating air permits. GMC-NATP had three permits for the facility's boilers, vehicle exhaust, and painting operations. The facility currently has one permit for its vehicle exhaust. The facility has violated its air permits for the boilers exceeding its limit for burning fuel oil; however, the boiler malfunctions that caused the violations were corrected and it appeared no further action was required (GMC-TBG 1991). The facility has no history of odor complaints from area residents.

GMC-NATP facility had two unleaded gasoline 8000-gallon USTs and one transmission fluid 10000-gallon UST. The USTs were about 20 years old and constructed of fiberglass. In 1990 and 1991, the facility removed the three USTs. During a federal, state, and local file review, PRC found no documentation indicating that a release had occurred from the USTs or that a release was noted during the removal of the USTs. In 1991, the facility installed one 10000-gallon UST for unleaded gasoline.

The facility does not have an NPDES permit to discharge to surface water and has had no CERCLA activity.



## **2.6**

## **ENVIRONMENTAL SETTING**

This section describes the climate; flood plain and surface water; geology and soils; and groundwater in the vicinity of the facility.

### **2.6.1**

#### **Climate**

The climate in Wayne County is continental. The average daily temperature is 48.5 °F. The lowest average daily temperature is 16.1 °F in January. The highest average daily temperature is 83.1 °F in July (NOAA 1980).

The total annual precipitation for the county is 32 inches. The mean annual lake evaporation for the area is about 30 inches (DOC 1968). The 1-year, 24-hour maximum rainfall is about 2 inches. The prevailing wind is from the southeastern direction and has an average wind speed of 10.3 miles per hour.

Due to the topography of the area, moist air from the northwest dries before it reaches the Detroit area. Therefore, summer showers coming from the northwest often dissipate before reaching Detroit. The northwesterly winter winds bring snow to all of Michigan, but rarely in accumulations of measurable depth in the Detroit area. Winds from the southeast generally contain more moisture (NOAA 1980).

### **2.6.2**

#### **Flood Plain and Surface Water**

The GMC-NATP facility is not located in a 100-year flood plain (FEMA 1981). The nearest surface water body, the Detroit River, is located 3.5 miles south of the facility and is used to supply municipal water to the City of Detroit. The facility does not have an NPDES permit to discharge to surface water. Storm water runoff from the facility collects on the paved areas around the facility and flows into storm water drains. Storm water drains to the city sewer system and is processed in Detroit's POTW before being discharged to the Detroit River.

### **2.6.3 Geology and Soils**

No site-specific geology and soil information is available. The following paragraphs discuss the regional and soil setting of Wayne County. This information was obtained from a soil survey of Wayne County, Michigan (Mozola 1969).

The surface geology of the Detroit area is characterized by a mosaic of glacial and organic deposits. Present land forms are the result of Pleistocene Epoch glaciation and subsequent deposition and erosion. The present land forms primarily consist of materials deposited during the Cary substage of the Wisconsin Glaciation; however, the hardpan encountered just above the bedrock in downtown Detroit occupies part of an ancient glacial lake bed that slopes gently to a nearly flat terrain that has been incised by currently flowing rivers and streams. Glacial deposits over bedrock range in thickness from 120 to 200 feet in this area. These deposits consist mainly of layers of glacial till of varying thicknesses and a thick sequence of lacustrine clays and silts.

The bedrock of Detroit consists of about 830 feet of consolidated and cemented Middle Devonian limestone from the Paleozoic Era. This structural feature underlies all of Michigan and portions of neighboring states. Within this structural basin, sedimentary rocks dip at an angle of less than 1 degree toward the center of the basin, which is located beneath the central portion of the southern peninsula.

### **2.6.4 Groundwater**

No site-specific groundwater information is available. The following paragraphs discuss the regional groundwater setting of Wayne County.

Groundwater in the area is generally encountered approximately 40 feet below ground surface (bgs). It generally flows southwest toward the Detroit River. However, because Detroit is located on a glacial lake plain composed primarily of silts and clays, the area is not favorable for the development of wells with moderate-to-large yields. Storage capacities are limited and well failures can be expected during long droughts (USGS 1989). Although the lake plain has a high frequency of dry holes, small domestic supplies within intermittent zones of relatively greater permeability than the



surrounding clay and silt deposits are normally possible. These intermittent zones occur under confined conditions, and both flowing and nonflowing wells can be expected. Southeast from the junction of the lake plain with the glacial moraines, the frequency, thickness, and extent of confined groundwater bearing zones decreases with proximity to the Detroit River.

Although the silt and clay deposits have limited ability to yield usable quantities of water, the shallow groundwater is usually soft and potable unless contaminated by human or industrial activities. In the intermittent zones described above, mineralization increases with depth. In addition, the quality of water from deep confined zones is often impaired by chlorides, hydrogen sulfide, and methane gas (Mozola 1969).

## **2.7 RECEPTORS**

The facility occupies 13 acres in an industrial area in Detroit, Michigan. Detroit has a population of about 1,028,000.

The facility is bordered on the north by Grand Trunk Railway, on the west by a retail meat market, on the south by Cameo Paint Company and an abandoned building, and on the east by Interstate I-75 and Commercial Carrier, Inc. The nearest school, Salesian High School, is located about 0.25 mile southwest of the facility. The nearest residence is located within 0.5 mile southeast of the facility. Facility access is controlled by 24-hour security guards, cameras, and an 8-foot chain-link fence with barbed wire.

The nearest surface water body, the Detroit River, is located 3.5 miles south of the facility and is used to supply municipal water to the City of Detroit. The facility does not have an NPDES permit to discharge to surface water. Storm water runoff from the facility collects on the paved areas around the facility and flows into storm water drains. Storm water drains to the city sewer system and is processed in Detroit's POTW before being discharged to the Detroit River.

Groundwater is not used as a private water supply. No drinking water wells and industrial wells are located within 3 miles of the facility. The facility has no on-site industrial water wells (MDNR 1993).

Sensitive environments are not located on site. No sensitive environments lie within 2 miles of the facility (DOI 1978).

### **3.0 SOLID WASTE MANAGEMENT UNITS**

This section describes the 12 SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and PRC's observations. Figure 2 shows the SWMU locations.

#### **SWMU 1**

#### **Former East CSA**

##### **Unit Description:**

The unit was located outdoors north of the Product Diesel Fuel ASTs (AOC 1). The unit consisted of 55-gallon steel drums on metal racks erected about 5 feet above the dike area on soil, measured about 120 by 75 feet, and operated as a storage area for greater than 90 days of hazardous waste.

##### **Date of Startup:**

This unit began operation in 1973.

##### **Date of Closure:**

This unit is inactive and was RCRA closed in August 1989.

##### **Wastes Managed:**

This unit managed nonhazardous phosphating sludge, spent solvent consisting of a mixture of methylene chloride, toluene, and methanol (D001, F001, F002, and F005), paint sludge liquid (D008 and 003D), spent methylene chloride (F001 and F002), spent toluene (F005), discarded methylene chloride (U080), discarded toluene (U220), discarded methanol (U154), and spent diesel fuel (D001). The disposition of the nonhazardous phosphating sludge is unknown. The spent solvent, spent toluene, discarded methylene chloride, discarded toluene, and discarded methanol are transported off site to Petro-Chem, in Detroit, Michigan, for fuel blending. From 1980 until 1985, paint sludge liquid and spent methylene chloride were transported off site to Michigan Disposal, in Belleville, Michigan, for disposal. Prior to 1980 and from 1985 until 1987, the disposition of



these wastes are unknown. The spent diesel fuel is transported off site to Petro-Chem, in Detroit, Michigan, for fuel blending.

**Release Controls:** The unit was located outdoors on soil and had a 3-foot concrete berm surrounding it.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** The unit contained no hazardous waste during the VSI. PRC noted no evidence of release (see Photograph No. 1).

**SWMU 2                      Former West Gondola Storage Pad**

**Unit Description:** The unit was located outdoors north of the facility's powerhouse. The unit consisted of a 20-cubic-yard roll-off box container on a concrete pad, measured about 12 by 24 feet, and operated as a storage area for greater than 90 days of hazardous waste.

**Date of Startup:** This unit began operation in 1973.

**Date of Closure:** This unit is inactive and was RCRA closed in August 1989.

**Wastes Managed:** This unit managed paint sludge (D008 and 003D). From 1980 until 1985, paint sludge was transported off site to Michigan Disposal, in Belleville, Michigan, for disposal. Prior to 1980 and from 1985 until 1987, the disposition of this waste is unknown.

**Release Controls:** The unit was located outdoors on a concrete pad.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** The unit contained no hazardous waste during the VSI. PRC noted no evidence of release (see Photograph No. 2).

**SWMU 3                                      Former Central Gondola Storage Pad**

**Unit Description:** The unit was located outdoors in the north-central area of the facility. The unit consisted of a 20-cubic-yard roll-off box container on a concrete pad, measured about 12 by 24 feet, and operated as a storage area for greater than 90 days of hazardous waste.

**Date of Startup:** This unit began operation in 1984.

**Date of Closure:** This unit is inactive and was RCRA closed in August 1989.

**Wastes Managed:** This unit managed paint sludge (D008 and 003D). From 1980 until 1985, paint sludge was transported off site to Michigan Disposal, in Belleville, Michigan, for disposal. Prior to 1980 and from 1985 until 1987, the disposition of this waste is unknown.

**Release Controls:** The unit was located outdoors on a concrete pad.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** The unit contained no hazardous waste during the VSI. PRC noted no evidence of release (see Photograph No. 3).

**SWMU 4                                      Former Spent Solvent SAAs**

**Unit Description:** The unit was located indoors and consisted of two accumulation areas for hazardous waste that were located in the Paint Mix Room and near

the paint booth. Each area was on a concrete floor and measured about 4 by 4 feet.

**Date of Startup:** This unit began operation in 1973.

**Date of Closure:** This unit has been inactive since 1987.

**Wastes Managed:** This unit managed spent solvent consisting of a mixture of methylene chloride, toluene, and methanol (D001, F001, F002, and F005). The waste was transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

**Release Controls:** The unit was located indoors on a concrete floor.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** The unit contained no hazardous waste during the VSI. The hazardous waste area in the Paint Mix Room contained one 55-gallon drum of product material. The concrete floor was wet from water that leaked into the room through holes in the bottom of the outside wall; however, PRC noted no evidence of a release (see Photograph No. 4). The hazardous waste area near the paint booth contained truck chassis. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 5).

## **SWMU 5**

### **Former CAA**

**Unit Description:** The unit was located indoors on a concrete floor that was near the paint booth. The unit consisted of a 1-cubic -yard container that measured about 8 by 10 feet, and operated as an accumulation area for hazardous waste.



**Date of Startup:** This unit began operation in 1973.

**Date of Closure:** This unit has been inactive since 1987.

**Wastes Managed:** This unit managed paint sludge (D008 and 003D). From 1980 until 1985, the waste was transported off site to Michigan Disposal, in Belleville, Michigan, for disposal. Prior to 1980 and from 1985 until 1987, the disposition of the waste is unknown.

**Release Controls:** The unit was located indoors on a concrete floor.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** The unit contained no hazardous waste during the VSI. The unit contained truck chassis. No cracks in the concrete floor or visible evidence of spills were observed (see Photograph No. 5).

#### **SWMU 6**

#### **Trash Compactor**

**Unit Description:** The unit is located outdoors next to the Former Central Gondola Storage Pad (SWMU 3) on a concrete pad. The unit consists of a 20-cubic-yard container with a trash compactor, and measures 12 by 24 feet. The unit operates as a storage area for nonhazardous waste.

**Date of Startup:** This unit began operation in 1973.

**Date of Closure:** This unit is active for disposal of municipal trash. Until 1987, this unit was used for the storage of nonhazardous paint chips.



**Release Controls:** This unit has no release controls.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** During the VSI, the surface of the water in the unit as well as the storm water manhole near the unit contained water with a milky white sheen (see Photographs No. 7 and 8).

**SWMU 8** **Current CSA**

**Unit Description:** The unit is located outdoors on a concrete pad. The unit is in the northeast area next to the Assembly Building and stores 55-gallon steel drums. The unit consists of a covered steel shed, measures about 30 by 12 feet, and operates as a less than 90-day storage area for hazardous wastes and as a storage area for product material.

**Date of Startup:** This unit began operation in 1985.

**Date of Closure:** This unit is active.

**Wastes Managed:** This unit managed nonhazardous phosphating sludge from 1985 until 1987. The unit currently manages spent toluene (F005), spent diesel fuel (D001), and product material. The disposition of the nonhazardous phosphating sludge is unknown. The spent toluene and spent diesel fuel are transported off site to Petro-Chem, in Detroit, Michigan, for fuel blending.

**Release Controls:** The unit is contained within a covered steel shed and it measures about 30 by 12 by 12 feet.

**History of Documented Releases:** No releases from this unit have been documented.



**Observations:** The unit contained two 55-gallon steel drums of spent toluene, two 55-gallon steel drums of spent diesel fuel (D001), and six 55-gallon steel drums of product material. During the VSI, the 55-gallon drums were in good condition and were stored closed on pallets. PRC noted no evidence of release (see Photograph No. 9).

## **SWMU 9**

### **Asbestos CSA**

**Unit Description:** The unit is outdoors on a concrete pad near the Nonhazardous CSA (SWMU 10). The unit consists of a covered 20-cubic-yard roll-off box and operates as a storage area for nonhazardous waste.

**Date of Startup:** This unit began operation in 1991.

**Date of Closure:** This unit is active.

**Wastes Managed:** This unit manages nonhazardous asbestos. The waste is transported off site to U.S. Pollution Control Industries, in East Chicago, Indiana, for disposal.

**Release Controls:** The unit is located outdoors on a concrete pad and is covered.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** The unit contained about 20 cubic yards of asbestos during the VSI. The unit was covered and closed. PRC noted no evidence of release (see Photograph 10).

**SWMU 10****Nonhazardous CSA**

**Unit Description:** The unit is located outdoors on a concrete pad in the north-central area near the Asbestos CSA (SWMU 9). The unit measures 40 by 8 feet and operates as a storage area for 55-gallon steel drums of waste.

**Date of Startup:** This unit began operation in 1993.

**Date of Closure:** This unit is active.

**Wastes Managed:** This unit manages caustic wastewater. According to a facility representative, the caustic wastewater is currently being analyzed to determine whether it contains hazardous constituents. The facility had a one-time generation of about 15 55-gallon steel drums of this waste. The disposition of this waste is contingent upon the analytical results.

**Release Controls:** This unit is located outdoors on a concrete pad, but has no other form of release controls.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** During the VSI, the unit contained 15 55-gallon steel drums of caustic wastewater. PRC noted minor waste stains near the unit; however, PRC noted no evidence of release from the unit to environmental media. During the VSI, the 55-gallon steel drums were on pallets in good condition and stored closed (see Photograph No. 11).

**SWMU 11****Used Oil Accumulation Areas**

**Unit Description:** The unit is located indoors on a concrete floor and consists of about 15 55-gallon steel drums located throughout the Assembly Building.

Each area of the unit measures 4 by 4 feet and is used to accumulate nonhazardous waste.

**Date of Startup:** This unit began operation in 1973.

**Date of Closure:** This unit is active.

**Wastes Managed:** This unit manages nonhazardous used oil that is transferred to the 800-Gallon Used Oil AST (SWMU 12) before disposal. The waste is transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

**Release Controls:** The unit is located indoors on a concrete floor.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** During the VSI, one area contained about 30 gallons of used oil. The 55-gallon steel drums were also in good condition and stored closed. PRC noted oil stains on the concrete floor surrounding the unit (see Photograph No. 12).

**SWMU 12** **800-Gallon Used Oil AST**

**Unit Description:** The unit is located outdoors on the steel roof of the Assembly Building and is not covered. The unit consists of an 800-gallon steel AST for storage of nonhazardous waste.

**Date of Startup:** This unit began operation in 1973.

**Date of Closure:** This unit is active.



**Wastes Managed:** This unit manages nonhazardous used oil. The waste is transported off site to Petro-Chem in Detroit, Michigan, for fuel blending.

**Release Controls:** The unit is not covered and the steel roof has three brick walls surrounding it and it has no curbing surrounding the edge of the roof on the fourth side.

**History of Documented Releases:** No releases from this unit have been documented.

**Observations:** The unit contained about 200 gallons of nonhazardous used oil during the VSI. PRC noted puddles of used oil on the steel roof surrounding the unit. The pipes leading inside the Assembly Building were sealed (see Photographs No. 13 and 14).

#### **4.0 AREAS OF CONCERN**

PRC identified one AOC during the PA/VSI. This AOC is discussed below; its locations is shown in Figure 2.

##### **AOC 1      Product Diesel Fuel ASTs**

This area consists of two 60000-gallon ASTs constructed of steel for storage of product diesel fuel. The ASTs are about 20 years old. The ASTs are located on soil with a 3-foot concrete berm surrounding them. During the VSI, PRC noted fuel stains on one side of the ASTs and the vegetation surrounding the tank appeared to be stressed (see Photograph No. 15). It is not known if one of the ASTs leaked. Because of the staining noted on the side of the AST, and the fact that the ASTs are located directly on soil, PRC considers this an AOC.

## 5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified 12 SWMUs and 1 AOC at the GMC-NATP facility. Background information on the facility's location; operations; waste generating processes and waste management practices; history of documented releases; regulatory history; environmental setting; and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. AOCs are discussed in Section 4.0. Following are PRC's conclusions and recommendations for each SWMU and AOC. Table 3, located at the end of this section, summarizes the SWMUs and AOCs at the facility and the recommended further actions.

### **SWMU 1                      Former East CSA**

**Conclusions:**                      The unit was located outdoors on soil. The unit consisted of 55-gallon steel drums on metal racks erected about 5 feet above the dike area on soil, measured about 120 by 75 feet, and operated as a storage area for greater than 90 days of hazardous waste.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit is inactive, RCRA closed, and no documented releases have occurred.

**Recommendations:**                      PRC recommends no further action for this SWMU at this time.

### **SWMU 2                      Former West Gondola Storage Pad**

**Conclusions:**                      The unit was located outdoors on a concrete pad and operated as a greater than 90-day storage area for hazardous waste. The unit consisted of a 20-cubic-yard roll-off box container.

RELEASED 4/17/99  
DATE  
RIN # 01281-99  
INITIALS mm



The potential for release to groundwater, surface water, air, and on-site soil is low because the unit is inactive, RCRA closed, and no documented releases have occurred.

**Recommendations:** PRC recommends no further action for this SWMU at this time.

**SWMU 3                      Former Central Gondola Storage Pad**

**Conclusions:** The unit was located outdoors on a concrete pad and operated as a greater than 90-day storage area for hazardous waste. The unit consisted of a 20-cubic-yard roll-off box container.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit is inactive, RCRA closed, and no documented releases have occurred.

**Recommendations:** PRC recommends no further action for this SWMU at this time.

**SWMU 4                      Former Spent Solvent SAAs**

**Conclusions:** This unit was located indoors on a concrete floor and consisted of two accumulation areas for hazardous waste. PRC noted no evidence of a release.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit is inactive, on a concrete floor, and no documented releases have occurred.

**Recommendations:** PRC recommends no further action for this SWMU at this time.

RELEASED  
DATE 4/2/99  
RIN # 01281-99  
INITIALS mv

ENFORCEMENT  
CONFIDENTIAL

ENFORCEMENT  
CONFIDENTIAL

**SWMU 5**

**Former CAA**

**Conclusions:**

This unit was located indoors on a concrete floor near the paint booth. The unit consisted of an accumulation area for hazardous waste. PRC noted no evidence of release.

RELEASED  
DATE 4/7/99  
RIN # 01281-99  
INITIALS uv

The potential for release to groundwater, surface water, air, and on-site soils is low because the unit is inactive, on a concrete floor, and no documented releases have occurred.

**Recommendations:**

PRC recommends no further action for this SWMU at this time.

**SWMU 6**

**Trash Compactor**

**Conclusions:**

This unit is located outdoors on a concrete pad and consists of a 20-cubic-yard container with a trash compactor. This unit operates as a storage area for nonhazardous waste. From 1973 until 1987, the unit was used for the storage of nonhazardous paint chips.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit manages nonhazardous waste on a concrete pad, no documented releases have occurred, and the unit appears to be properly managed.

**Recommendations:**

PRC recommends no further action for this SWMU at this time.

**SWMU 7**

**Lime Wastewater Holding Tank**

**Conclusions:**

This unit is located outdoors north of the facility's powerhouse and consists of an underground holding tank. It operates as a storage area for nonhazardous waste. The facility representative did not know the size of the tank or the

RELEASED  
DATE 4/7/99  
RIN # 028-99  
INITIALS WV

ENFORCEMENT  
CONFIDENTIAL

tank's construction material. PRC noted water with a milky white sheen in the unit and in the storm water manhole near the unit.

The potential for release to on-site soils is low to moderate because the tank is old, constructed of unknown material, and the water may contain hazardous constituents. The potential for release to groundwater, surface water, and air is low.

**Recommendations:** PRC recommends that the facility identify the source of the milky white sheen on the water surface. PRC also recommends sealing the underground pipes, and emptying and properly disposing of the contents in the unit.

**SWMU 8                      Current CSA**

**Conclusions:** This unit is located outdoors on a concrete pad next to the Assembly Building. During the VSI, the 55-gallon drums were in good condition and stored closed.

The potential for release to groundwater, surface water, air, and on-site soil is low because no documented releases have occurred, the unit has secondary containment, and it appears to be properly maintained.

**Recommendations:** PRC recommends no further action for this SWMU at this time.

**SWMU 9                      Asbestos CSA**

**Conclusions:** This unit is located outdoors in the north-central area next to the Assembly Building on a concrete pad. This unit consists of a 20-cubic-yard container that was covered and closed.



RELEASED  
DATE 8/17/99  
RIN # 01281-99  
INITIALS WV

ENFORCEMENT  
CONFIDENTIAL

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit manages nonhazardous waste on a concrete pad, no documented releases have occurred, and it appears to be properly maintained.

Recommendations: PRC recommends no further action for this SWMU at this time.

**SWMU 10**

**Nonhazardous CSA**

Conclusions: This unit is located outdoors on a concrete pad next to the Assembly Building. The 55-gallon steel drums were in good condition and stored closed during the VSI.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit managed nonhazardous waste on a concrete pad. No documented releases have occurred, and the unit appears to be properly maintained.

Recommendations: PRC recommends no further action for this SWMU at this time.

**SWMU 11**

**Used Oil Accumulation Areas**

Conclusions: This unit is indoors on a concrete floor in locations throughout the Assembly Building. During the VSI, the 55-gallon steel drums were in good condition and stored closed.

The potential for release to groundwater, surface water, air, and on-site soil is low because the unit manages nonhazardous waste indoors on a concrete floor, no documented releases have occurred, and the unit appears to be properly maintained.

Recommendations: PRC recommends no further action for this SWMU at this time.

RELEASED  
DATE 4/7/99  
RIN # 01281-99  
INITIALS mv

ENFORCEMENT  
CONFIDENTIAL

**SWMU 12**

**800-Gallon Used Oil AST**

**Conclusions:**

This unit is located outdoors on the steel roof of the Assembly Building and is not covered. This unit consists of one 800-gallon AST for storage of nonhazardous waste. PRC noted puddles of used oil on the roof surrounding the unit. The pipes leading inside the Assembly Building were sealed shut. The unit is not covered and the steel roof has three brick walls surrounding it and it has no curbing surrounding the edge of the roof on the other side. Therefore, during periods of heavy rainfall the waste may run off the roof onto the concrete area below and subsequently to on-site soils.

The potential for release to on-site soils is low to moderate because the unit is not covered and is not properly managed. The potential for release to groundwater, surface water, and air is low.

**Recommendations:**

PRC recommends that the facility cover the unit and practice better waste management techniques in order to prevent spillage of waste.

**AOC 1**

**Product Diesel Fuel ASTs**

**Conclusions:**

This area consists of two 60000-gallon ASTs constructed of steel for storage of product diesel fuel. The ASTs are located on soil with a 3-foot concrete berm surrounding them. The ASTs are about 20 years old. During the VSI, PRC noted fuel stains on one side of the ASTs and vegetation surrounding the ASTs appeared to be stressed.

The potential for release to groundwater and on-site soils is moderate because one AST appears to have leaked a hazardous product material and the vegetation surrounding the ASTs appears to be stressed. The potential for release to surface water and air is low.

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CONFIDENTIAL

Recommendations: PRC recommends that the facility conduct soil sampling for organic constituents and total petroleum hydrocarbons (TPH) at this AOC to determine if releases have occurred.

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DATE 4/7/99  
RIN # 01281-99  
INITIALS WV



RELEASED 9/17/99  
DATE  
RIN # 01281-99  
INITIALS WV

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TABLE 3  
SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Former East CSA	1973 - August 1989	None	No further action at this time.
2. Former West Gondola Storage Pad	1973 - August 1989	None	No further action at this time.
3. Former Central Gondola Storage Pad	1984 - August 1989	None	No further action at this time.
4. Former Spent Solvent SAAs	1973 - 1987	None	No further action at this time.
5. Former CAA	1973 - 1987	None	No further action at this time.
6. Trash Compactor	1973 - 1987	None	No further action at this time.
7. Lime Wastewater Holding Tank	1973 - 1991	Milky white sheen on surface of water	Identify the source of the milky white sheen on the water, seal the underground pipes, and empty and properly dispose of the contents in the unit.
8. Current CSA	1985 to present	None	No further action at this time.
9. Asbestos CSA	1991 to present	None	No further action at this time.
10. Nonhazardous CSA	1993 to present	None	No further action at this time.
11. Used Oil Accumulation Areas	1973 to present	None	No further action at this time.

RELEASED

DATE

RIN #

INITIALS

9/12/99  
028199  
mwENFORCEMENT  
CONFIDENTIAL

TABLE 3 (Continued)

## SWMU AND AOC SUMMARY

<u>SWMU</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
12. 800-Gallon Used Oil AST	1973 to present	Used oil on the roof surrounding the unit.	The facility should cover the unit and practice better waste management techniques.
<u>AOC</u>	<u>Dates of Operation</u>	<u>Evidence of Release</u>	<u>Recommended Further Action</u>
1. Product Diesel Fuel ASTs	1973 to present	Fuel stains on the side of one AST and the vegetation in the surrounding area appeared to be stressed.	The facility should conduct soil sampling for organic constituents and TPH.

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**APPENDIX A**  
**VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS**  
**(10 Pages)**

## **VISUAL SITE INSPECTION SUMMARY**

**General Motors Corporation - Northern American Truck Platforms  
(Formerly General Motors Corporation - Truck and Bus Group)  
601 Piquette Road  
Detroit, Michigan 48202  
MID 076 380 583**

**Date:** June 3, 1993

**Primary Facility Representative:** Tom Henderson, Environmental Coordinator  
**Representative Telephone No.:** (313) 974-3664  
**Additional Facility Representatives:** Gary Stahle, Environmental Engineer  
(313) 857-5197

**Inspection Team:** Ron Baker, PRC Environmental Management, Inc. (PRC)  
Mary Joyce Freibert, PRC

**Photographer:** Ron Baker, PRC

**Weather Conditions:** Overcast, 60° F

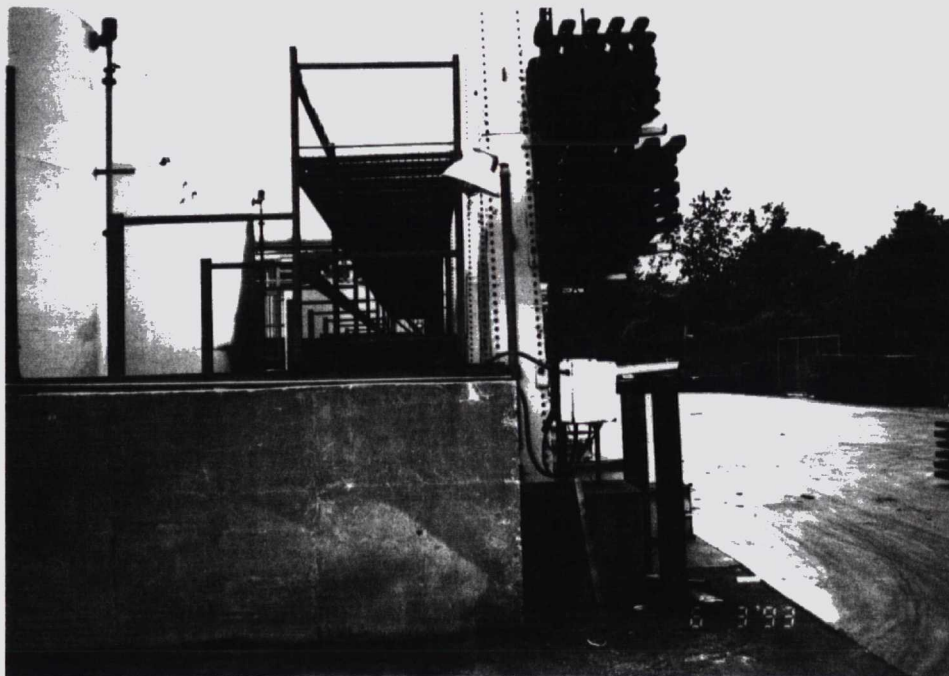
**Summary of Activities:** The visual site inspection (VSI) began at 11:00 a.m. with an introductory meeting. The inspection team explained the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the facility's past and current operations, solid wastes generated, and release history. Facility representatives provided the inspection team with copies of requested documents.

The VSI tour began at 2:45 p.m. PRC inspected the Former East Container Storage Area (CSA) (SWMU 1), Former West Gondola Storage Pad (SWMU 2), Former Central Gondola Storage Pad (SWMU 3), Former Spent Solvent Satellite Accumulation Areas (SAA) (SWMU 4), Former Container Accumulation Area (CAA) (SWMU 5), Trash Compactor (SWMU 6), Lime Wastewater Holding Tank (SWMU 7), Current CSA (SWMU 8), Asbestos CSA (SWMU 9), Nonhazardous CSA (SWMU 10), Used Oil Accumulation Areas (SWMU 11), 800-Gallon Used Oil Aboveground Storage Tank (AST) (SWMU 12), and Product Diesel Fuel AST (AOC 1).

The tour concluded at 5:00 p.m., after which the inspection team held an exit meeting with facility representatives. The



VSI was completed and the inspection team left the facility at 5:30 p.m.



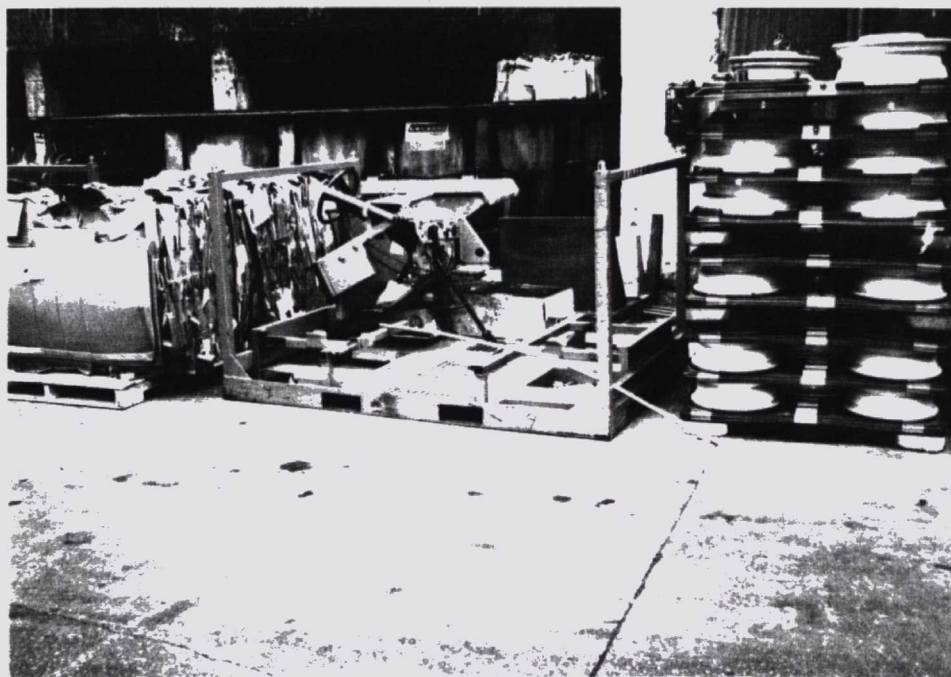
Photograph No. 1

Orientation: Southwest

Location: SWMU 1

Date: 06/03/93

Description: Former East CSA with the erected metal racks inside the 3-foot concrete berm and next to the Product Diesel Fuel ASTs (AOC 1)



Photograph No. 2

Orientation: North

Location: SWMU 2

Date: 06/03/93

Description: Former West Gondola Storage Pad in front of the facility's equipment



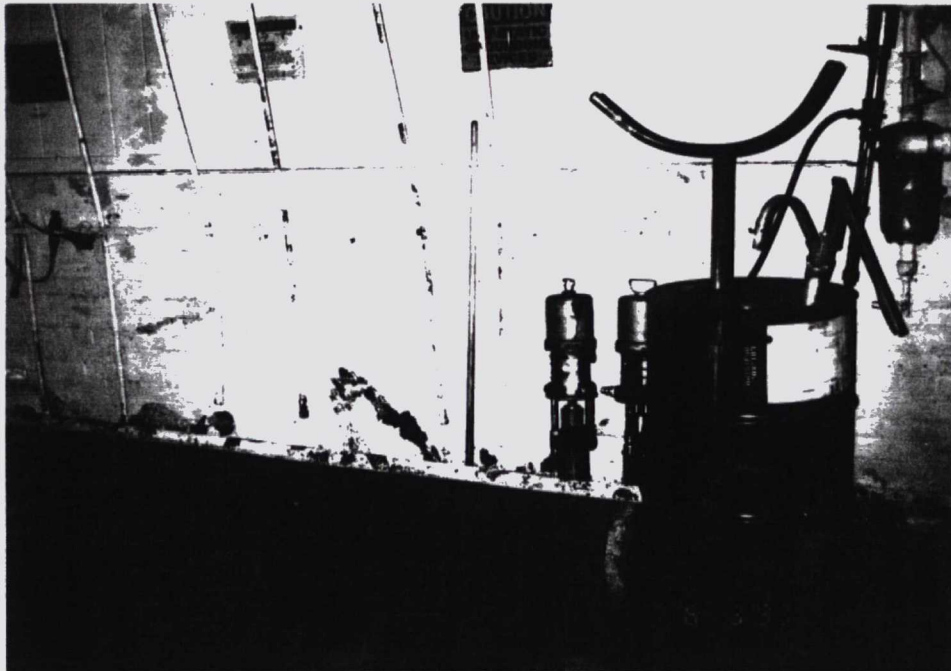
Photograph No. 3

Orientation: Southeast

Description: Former Central Gondola Storage Pad between the railroad track and metal carts

Location: SWMU 3

Date: 06/03/93



Photograph No. 4

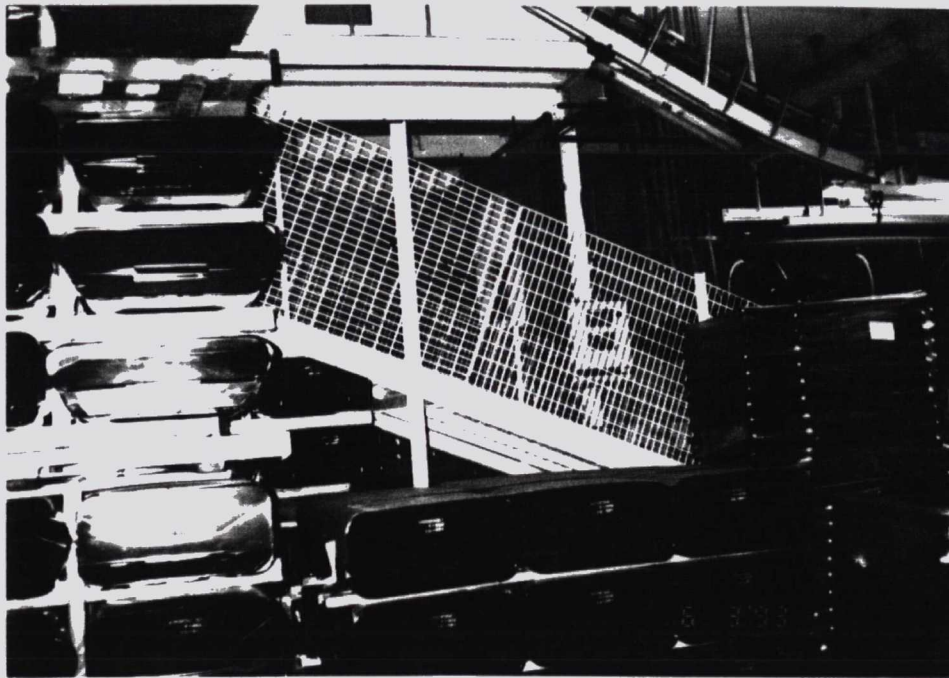
Orientation: South

Description: Former Spent Solvent SAAs in the Paint Mix Room showing water on the concrete floor from rainfall leaking into the room and a 55-gallon steel drum of product material

Location: SWMU 4

Date: 06/03/93





Photograph No. 5

Location: SWMUs 4 and 5

Orientation: South

Date: 06/03/93

Description: Former Spent Solvent SAAs and Former CAA near the paint booth; this area currently contains truck chassis



Photograph No. 6

Location: SWMU 6

Orientation: Northwest

Date: 06/03/93

Description: Trash compactor with 20-cubic-yard container on a concrete pad that had cracks which were sealed



Photograph No. 7

Orientation: West

Description: Three manhole lids of the lime wastewater holding tank

Location: SWMU 7

Date: 06/03/93



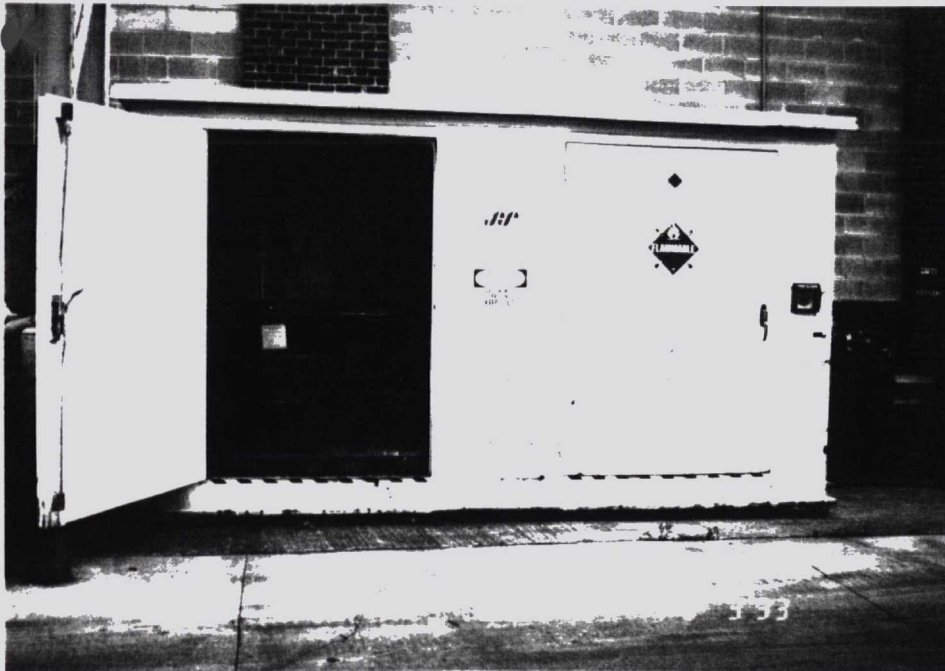
Photograph No. 8

Orientation: West

Description: Lime wastewater holding tank manhole opened; note milky white sheen in the water

Location: SWMU 7

Date: 06/03/93



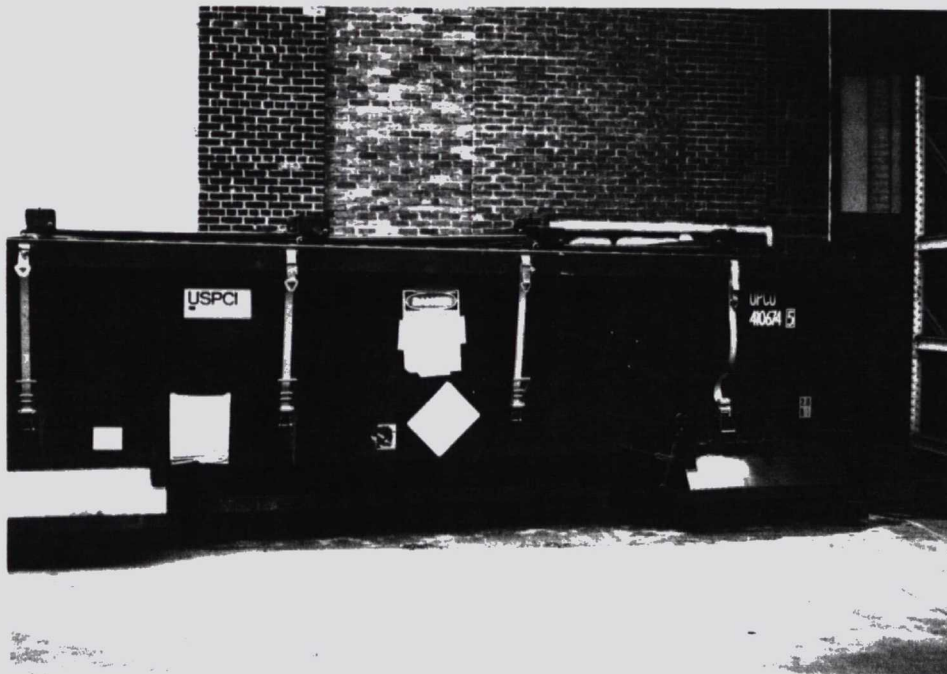
Photograph No. 9

Orientation: South

Description: Current CSA showing 55-gallon steel drums of hazardous waste on a pallet; door was opened for the photograph

Location: SWMU 8

Date: 06/03/93



Photograph No. 10

Orientation: South

Description: Asbestos CSA that consisted of a 20-cubic-yard roll-off box; container is covered

Location: SWMU 9

Date: 06/03/93





Photograph No. 11

Orientation: Southeast

Location: SWMU 10

Date: 06/03/93

Description: Nonhazardous CSA located a concrete pad that had 55-gallon steel drums of caustic wastewater on pallets



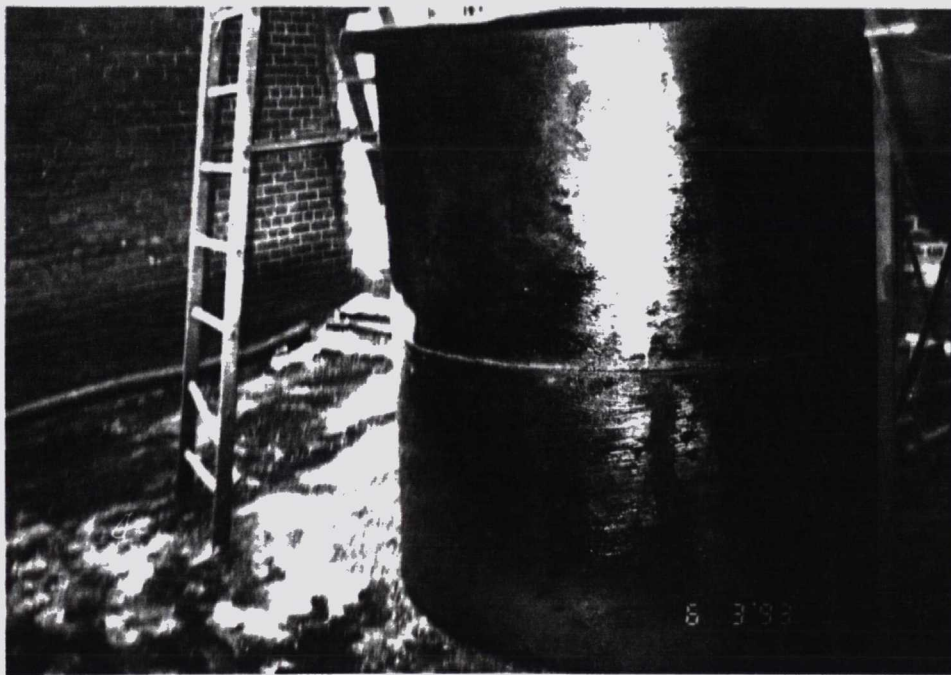
Photograph No. 12

Orientation: Northeast

Location: SWMU 11

Date: 06/03/93

Description: Typical used oil accumulation area with oil stains on the concrete floor surrounding the unit



Photograph No. 13

Orientation: Northwest

Location: SWMU 12

Date: 06/03/93

Description: The 800-gallon used oil ASTs; note used oil on the steel roof surrounding the unit



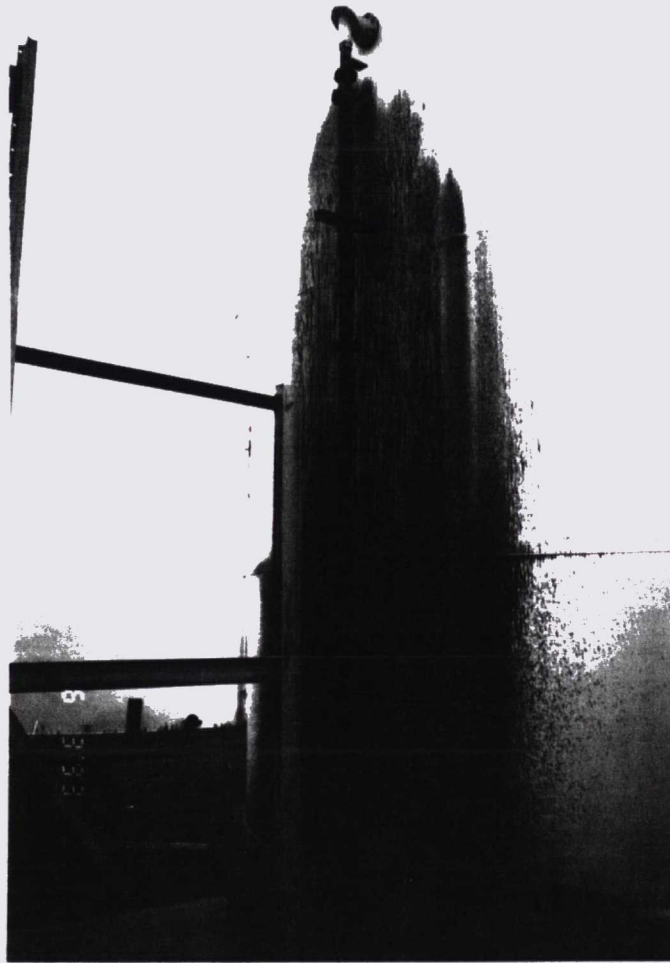
Photograph No. 14

Orientation: Northwest

Location: SWMU 12

Date: 06/03/93

Description: The 800-gallon used oil AST; note used oil on the steel roof surrounding the unit



Photograph No. 15

Orientation: Southeast

Description: One of the Product Diesel Fuel ASTs; note: fuel stains on the side of the AST

Location: AOC 1

Date: 06/03/93

**APPENDIX B**  
**VISUAL SITE INSPECTION FIELD NOTES**  
(20 Sheets)



48°F, Overcast

M. Trout, PC

R. Baker, PC

Bob Atkins, GMC

Gary E. Stalko, Fountain

Tom Henderson, GMC

1919 - Fisher Body - Armstrong GMC

part of Day Plant

Do not know of

undeveloped land

1973 - 6M - Assembly Division

Cut away Van Division

Blue Chevrolet -

Standard Part of Van

G-Van

1974 P - Chevrolet - which

still - Not ready to

GMC to Chevrolet

might

6/3/83

①

③

(2) 6/3/93

1984 - GMC - Trucks & Bus  
Operations

1973 - 1974 - Paint Operations  
Metal Cleaning -  
Phosphatizing of Metal  
Painted

1974 - 87 Bumpers & Wheels

1987 - Discontinued Painting  
Operations

- just do black chaotise

1987 - 89 Closure of units -  
LSAs

1992 - GMC -  
North American Truck  
Platform (NATP)

1987 - 1993 - Discontinued painting  
operations, the same

mgk 6/3/93

6/3/93 (3)

to be used - to purge black chaotise line  
Petro-Chem Detroit, MI

Painting Operations - Cosmetic  
Spray operation

Askel for Biennial Reports  
beginning in 1985.

Waste Streams - Paint Sludge Gondola

Paint Sludge - skimmed paint  
100-gallon container -  
hailed outside dropped

box - 20-cubic yard ->

Unit closed. Unit

Wastewater - released to  
Sanitary - POTW (Detroit)  
Holding Tank - size ??

mgk

④

6/3/93

③ Methylene Chloride <sup>→ clean</sup> & <sup>Paint</sup> hooks  
solvents - accumulated  
in 55-gallon - near  
Paint Booth

④ Stored Hay Waste Shed  
less than 90-days

⑤ Barrel Storage Area -  
Stores empty 55 gallon  
drums

⑥ Paint Chips - into  
compactor

⑦ Phosphatizing Line  
1974 - 1986-87

Series dip - All aboveground

① cleaning / rinsing / ③ Phosphatizing /  
1,000 gallon tank

⑦ Rinsewater

⑧ Sludges

6/3/93

⑤

Never used cyanide in the  
treatment of metals.  
was on Part A permit

Any questions after today -  
needs to be in writing.

1979 - 1974

Body panel dye

① Sandblast

② Wood dye -

③ Metal dye - scrap metal

④ oil

④ Used oil - building of the  
vehicle

- accumulated at each  
repair area - 55 gallon drum  
not



⑥

6/3/93

Used oil from topping  
of transmission filtered,  
General Oils → sent to

800 gal holding tank  
for used oil

⑩ Scrap  
Diesel fuel & gasoline -  
55 gallon drum  
Petro - Chem  
H.W. Shed

⑪ Toluene - 55 gallon  
H.W. Shed  
Paint mixing room -  
Accumulated

10 K AST - diesel fuel

1  
not

6/3/93

⑦

2 150K AST are  
empty

Used to hold #6 fuel  
oil - pieces of  
closing power house - January 92

Ash bags - Dry Stumbring

3 ~~UST~~ system

Cyclone System

Ash sent to \_\_\_\_\_ ?

Maybe Landfill

Sanitary Landfill

3 UST

2 ~~8~~ 8 K

Relative  
to  
pump

West

East

1

NW

10 to 15 K

tributaries

best

① gasoline

② transmission fluid

East

10 to 15 K

tributaries

best



⑧

6/3/93

1991 - LST installed  
Old tanks were pulled  
in 1990 and 1991

Has report on the pulling  
of LST - says will  
give to us.

### Air Permits

for 3 Bilers - powerhouse

Vehicle exhaust → stack  
hot Lube gun

No NPDES permit

- Air emission violation -  
minor last  
couple yrs.  
not

4/3/93

⑨

Will give us a copy

Gasoline overfill -  
reported and documented  
reported to fire depart  
@ MONR -

in pump house

about 200 gallons in  
sanitary  
sewer

- will give us documentation  
on the spill

8-foot chain link w/ barb  
wire

24-hour security w/ cameras -  
on peripheral corners

MF

(10)

6/3/93

Geology

Facility on Blue Clay  
Salt Mine - about 1,000 ft down - from

Shaffer Hwy

closest surface water

Detroit River -

surface ~~at~~ <sup>1/2</sup> mi

3 1/2 miles ~~east~~ <sup>west</sup> South

Drinking water -

Lake Detroit - Fort Huron

No ground water wells  
in the area

City on Lake Detroit

MONR

Northfield <sup>Office</sup>

- 6 miles I-575

- info on wells

~~mt~~

6/3/93

(11)

N - Grand Trunk Railway

E - I-75 - CCI

Commercial Carrier Inc.

- Storage Area

W - Meat Market (Retail) <sup>Butter</sup>

S - Canes Paint / Fischer  
Body

Barkley - abandoned

50 employees - <sup>mt</sup> ~~one~~ 8 hr <sup>5 hr</sup> shift

SW - Residential - 2 blocks

Facility about 12 1/2 acres

Industrial area - zoned

2:15 PM Facility Tour  
To look at

@ Painting Operations

- 100-gallon tank - skimmer

- Waste H<sub>2</sub>O holding tank

(12)

6/3/93

- ✓ Outside paint sledge
- ✓ 20 wheel
- ✓ Fuel containers
- ✓ 55 gallon SPH -
- ✓ Methylene chloride
- ✓ and solvents
- ✓ Liquid H<sub>2</sub>O Spd (GSA)
- ✓ Fuel Storage Area
- ✓ Compressor - Paint Claps
- ✓ Phosphating Line
- ✓ 3 tanks
- ✓ Repair Area -
- 55 gallon drum of
- ✓ used oil
- ✓ 800 - gal tank for
- ✓ Used oil
- ✓ Paint Mixing Room
- ✓ 55 gal drum

6/3/93

(13)

- ✓ 100 lbs removed
- ✓ 3 UST
- ✓ 100 lbs - wheel spoked
- ✓ 35 gal pump diesel fuel
- ✓ and gasoline
- ✓ 100 lbs
- ✓ 100 lbs both operations
- ✓ Phosphating Line
- ✓ on concrete floor
- ✓ direction: South
- ✓ 3 Paint Mix Room - 1 South
- 55 gallon to leave SPH
- ✓ water - on the ground
- ✓ 100 lbs
- ✓ 100 lbs



(14)

6/13/93

Photo

(4)

~~East~~ Northeast

Used oil - AAA

(5)

3 USTs - New

Leak detection system  
direction - east

(6)

North - ~~Barrel~~ Storage

Area - Part A

Empty Drums

(7)

Storage area - inside

dike area - West

Closure of unit

Batteries → sent ~~Retlgen~~  
East

AC Delco Remay

Toledo, Ohio

120 batteries

MPT

6/13/93

(15)

(8) South - H/W Shed

1 55-gal. Toluene &amp; Xylene

T003 30 gal.

(2) 55-gal - grease

(3) Diesel fuel D001 - 110 total  
1 1/2 drums of product - toluene - 2 55 gal.

total 6 drums

6 product drums

(9) North - Sand Storage

Gondola - Closure of unit -

Sort Samples

(10) Northwest - Conveyor

w/ 20-cubic yards

Laidlaw

(11) Ashotos - Pouchhouse

Removal container

South

MPT



(17)

6/3/93

operation -  
Fug Mill - Allocated  
City Sand & Gravel  
Debris  
little pellets

(16)(17) Used oil tank  
BVO - gel -

Prison - that leads  
to sanitary sewer

Septic - drains piped  
General office recycling  
Paper all over

floor - no roof  
on top of room

Paper to underneath  
for emptying tank  
MAY

(16)

6/3/93

20 cubic yard  
containers - gravel  
sand sludge  
Southcoast

(13) Southcoast -

Sanitizer from  
cleaning empty  
Storage area

(14) line holding tank for  
flowdown of lenses  
West - direction

Remade next to  
them

(15) West - spec. to tank  
City Environmental  
Fixed side gate  
MAY

(13)

6/3/93

4:45<sup>pm</sup> Facility tour finished4:50<sup>pm</sup> Received info for

① air and liquid spill release

② air permits

③ Closure plan for CSAs

④ Biennial reports for 1985 to current

T. Henderson will send info about

① UST closure Plan

② Boiler Ash - Report

③ Painting operations - holding tank - the site of it by June 11

MJE

6/3/93

(14)

Asked for biennial reports for after 1985

5:20<sup>pm</sup> Closing meeting5:50<sup>pm</sup> off-site

MJE

June 3, 1993  
RHB

(138)

1115 - at GMC Bus & Truck

601 Piquet Rd. Detroit, MI

Weather → overcast - 58°-62° F

- Met with Mr. Tom Henderson

USS boss and 5 others -

we will  
attach  
copy -

Various individuals from Corp.

note tabers etc.

an attendance  
sheet was  
passed -

- Mary F. explaining the process

- Mr. Henderson - stated that

the plant never operated

a wastewater treatment unit

- Mary explains contents of  
inspection - based on TSP  
status -

Plant Waste management

~~plant~~ operations / current

RHB - 6/3/93



(139)

June 3, 1993

Closure was conducted by  
CLM - in 19

- History -

1919 - Fisher body tool in the  
Plant -

Not sure if plant was  
constructed then -  
would like to look at  
property title -

- made dies and patterns for stamping mill -

1973 - General Motors assembly  
Division (AD) - changed to

But - away Van assembly.  
Still the [Revised Printing]

1974 - converted to P-chassis -  
currently building  
switched Management from  
RHR 6/3/93

(140)

June 3, 1993

Gen. Motors AD to GM Chevrolet

1984. Gen Motors → Bus and  
truck group - (Name  
change only)

1974-1987 - did bumper and wheel  
finishing - discontinued the  
paint shops and prime operations

Preparation was for pre-paint finish  
on bumpers and body panels

1987-1989 - closure procedure -  
- closure plan -

[we can get a copy of the  
closure plan and soil boring  
results - also certification of  
closure]

RHR 6/3/93



(141)

June 3, 1993

-1993 - New Name

North American Truck Platforms

(142)

June 3, 1993

1200 - Lunch Break

1245 - Return Lunch

→ essentially, operations same since

1987 - prior to 1987 painting

was conducted; since ~1972

current method of painting

is a spray application of

toluene based spray paint -

? toluene is used to flush

lines after line is shut

down - -

Mary is asking for Spinning Reports

to see past wastes generated -

- currently not required to

file biennial as CESQG

RFB 6/3/93

Waste streams - paint sludge -

Water Contaminant in overspray of

paint booth - collected

Skimmings in a 100-gallon

Box - that material was

taken to a 'drop box'

\* outside facility - 20 cu yd.

\* in a closed area -

Paint sludge

→ Wastewater was analyzed before  
being released to DetroitSewer (sewer is combined storm  
and sanitary)\* sewer  
? configuration of holding tank

and exact procedures for

for holding wastewater from

Water Contaminant system

6/3/93 RFB

(143)

June 3, 1993

with the child solvent -

\* Synthetic and CSF - now

Grounds waste slab -

- hazardous waste shed not closed

- 20-cubic yard container and

granules in same spot?

Metz chloride - used in clean tanks

reson in paint line -

same Speculative -

to Carpenter - general paint

rubish - > ?

- Will call someone for paint

area to research of practices

waste management

Phosphating operations -

Journal 1086-87 general waste

1973

2/3/93

(144)

June 3, 1993

\* When in facility -

- dip tank system -

series of rinses - cleaning - phosphating

→ phosphate sludge

→ M. Henderson was not familiar

→ enough with the phosphating

→ system to delineate the

question waste coming from the phosphating

system and their dispositions

People with knowledge of

Phosphating operations are

case - really only available

information is from Henderson

→ Henderson's reports -

→ put into writing

dash oils - engine fluids -

your box, Power steering - etc.

put into drums -

2/3/93



(145)

June 3, 1993

55-gallon drums taken to  
\* given an accumulation tank in  
another part of plant  
800-900 gallon tank  
then to local oil recycler  
(get name for - copy of  
Brenner!)

55-gallon drums of gasoline  
from misfilled tanks -  
goes to local petrochem  
hauled in 90-day shed -

Toluene from line flush  
accumulated in 55-gal  
drums to  
shed - go petrochem  
~ 55-gal/6 mo.

2/28 6/3/93

June 3, 1993

(146)

Diesel is <sup>4</sup> above-ground

10,000 gal inside diked  
area ~~where~~ #6 fuel oil?

(2) 150,000 gal power plant operate  
dry scrubbing system generated  
ash into wet bags - Recently -  
\* rate? disposition?  
- in records we will have to  
look at later

(2) 8,000 gallon UST's

(1) gasoline (West tank)

(1) transmission fluid

(1) 15,000 gallon tank

(1) gasoline (Northwest tank)

→ all installed in 1991 -  
tanks previously <sup>there</sup> were pulled in  
1991

2/28 6/3/93



(147)

June 3, 1993

air permits -

(3) major permits currently

going to drop ~~for~~ because

boilers off-line

several air permits - vehicle

exhaust

glue guns - etc

painting - etc

Upper Level Air Pollution

Control Division - has records

and complaints

- Air Incident - opacity

Mr. Tommy Henderson will give us a

\* copy of Report

2/18/93 6/3/93

police 7 are on m.p.

- gasoline spill - overflow of

~~that is repair gulf tank~~

spill from vent along

pump house spill entered

the sewer was cleaned by

the fire dept.

Sealing, 8' fence - electronic

gates - 24 hour, 7 days week

- Surface data - Detroit River

38 miles south west of

facility

- Geology - clay overlying basin

sediments - Salt marshes

their closure Report from

WJM includes boring logs

Mr. Henderson will provide -

2/18/93 6/3/93

(148)

June 3, 1993

(149)

June 3, 1973

Northville office - G. and J.  
275 - MDNR has geologic

map of Detroit area  
- Drinking water from Lake Huron -

Property Boundaries -

Tr 75 - on East International  
Carriage  
Carriers

West - Unknown - west marker  
old Dodge facility

North - Grand Trunk Western  
Railroad

South - Park's lot old Fisher Body  
Cameo - Barking now -

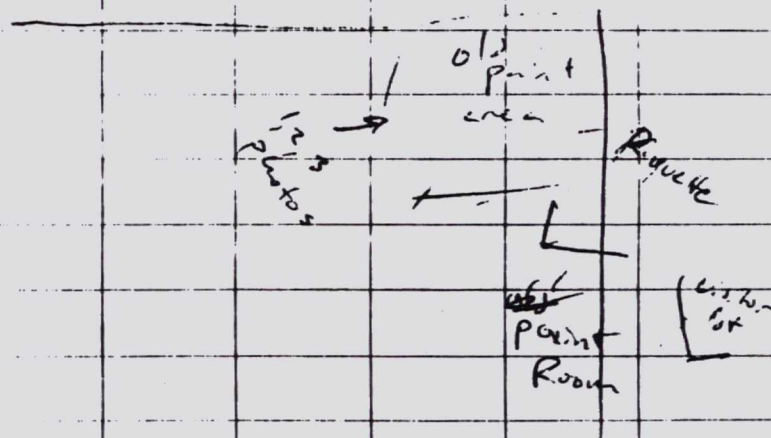
Not owned by GM any longer  
- Zoned heavy industrial -

RAB 6/3/73

June 3, 1973

(150)

1445 - Begin facility tour -  $\begin{matrix} \swarrow & \searrow \\ N & E \end{matrix}$   
at



Photos

1-3 of old print line area

Phosphating area -

Concrete floor - used to vent  
through roof to outside

Photo

4 - where old print purge

room - satellite area -  
empty at time of inspection



(151)

June 3, 1993

Concrete floor - with seams  
Room also used for product  
pump in tanks -

Photo - looking Southeast  
5. Van Gas - vehicle fluids -  
Bottle - on concrete  
in (2) 55 gallon drums -  
in chassis staging area  
(final process area)

Photo - USTs - looking east  
6 (3) described previous

No Photo - from phone -  
manhole - gas spill entered  
looking west from roof of  
pump house -

RJR  
6/3/93

June 3, 1993 -

(152)

Diesel fuel 10,000 gallon tank  
some spillage around discharge pipe  
No photo area asphalted

Photo Empty drum storage area -  
7 - Looking North -  
outside dike area  
bins empty - during inspection  
- area is covered with  
asphalt  
- AC Delco Battery (GM) Replaced  
in trailer - Total Off -  
Kept in same area -

Photo Racks inside North  
6 wall of dike -  
old storage area

RJR  
6/3/93



(153)

June 3, 1993

Photo - inside shed area  
East 150' on golf track

apparent spill area -

Photo 1432 - storage shed -  
4 55-gallon drums

taken, 742 = shed =

looking South

Stuck Box Pad

- closed container storage

area - looking North across

rail spur - on concrete

Photo 12) trash cans to  
looking West / Northwest

12

7/1/93

6/3/93

Photo 13

Ballast - Power house

ashtrays - 22 yds -

Photo 14

found 20 yds up.

has accumulation area

/pavement to Photo 11 area -

Photo 15

2) Kinstate drums for -  
empty drum (leaked)

leaked area - Roubidoux -

in farm with bin area

adjacent to boiler

where bags were accumulated

from cyclones -

(the weather see ~~the~~ area)

the area no bags

and ashtrays removed under

Photo 15

7/1/93

6/3/93

June 3, 1993

(154)

(155)

June 3, 1993

Photo holding tank, 500  
boiler bleed down -

tanks constructed of

Photo inside above and below  
blew down tank -

Photo  
no  
whisker

was - Whisker water in shore

drain ~ 10 feet from  
blew down tank -

Photos  
18! Third floor waste oil  
holding tank -

drains to truck -

\* from drain in corner  
off of roof where

that is - major plugged  
7/22 6/3/93

(156)

June 3, 1993

According to Mr. Henderson, the  
drain is plugged so it will  
not discharge to the sewer  
system -

he looked at the 2nd and  
of tank ~ 2 on second floor -

~~it was the~~ RAB

- Closing meeting -

Facility: Did you see any major concern?

I indicated to Mr. Henderson

that the apparent release

was inside the ditch area

concerned me -

My explanation of the report

and the other from the report

7/22 6/3/93